

Newcastle-under-Lyme Local Plan - Main Modifications Consultation Responses 19.12.2025

Persimmon Homes (North West) Limited, Asteer Planning LLP, Power, Jon

Comment ID	33
Response Date	09/12/2025 17:02:00
Consultee Company / Organisation	Persimmon Homes (North West) Limited
Agent Company / Organisation	Asteer Planning LLP
Agent Family Name	Power
Agent Given Name	Jon
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM108
Q4page - Page	69 of the Main Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy TB23
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for providing an opportunity to comment on the Newcastle-under-Lyme Borough Council (herein referred to as "NUL" or "the Council") Main Modifications to the Newcastle-under-Lyme Local Plan 2020-2040 ("Main Modifications"). Asteer Planning LLP ("Asteer") act on behalf of Persimmon Homes (North West) Ltd ("Persimmon") in relation to land to the West of Galingale View (Site ref: "TB23"). These representations comment on the Main Modifications to the Local Plan as they relate to Site TB23 – including in the context of participation and discussion at Local Plan Examination.</p> <p>Persimmon owns Site TB23, which has been promoted robustly through the entirety of the Local Plan process. The site is wholly deliverable (being suitable, available and achievable) for residential development as demonstrated robustly by the evidence presented in duly made representations in August 2023 (at Regulation 18 Stage) and in October 2024 (at Regulation 19 Stage), which have been supported by a Vision Document and Masterplan; and through participation in the Local Plan Hearing Sessions (in May and June 2025).</p> <p>These representations should be read in parallel with our detailed Regulation 19 representations and Hearing Statements prepared in respect of the following matters in relation to Site TB23:</p> <ul style="list-style-type: none"> • Matter 2 – Spatial Strategy and Site Selection • Matter 5 – Housing Supply • Matter 6 - Housing Allocations <p>Persimmon fully supports the allocation of Site TB23 and considers that the evidence base that has supported its allocation, as it relates to the site, is sound. Proposed Policy TB23 is considered sound, subject to the Main Modification proposed, which Persimmon fully support. Persimmon consider that the site is entirely deliverable in the early years of the Plan Period and is preparing a planning application that will expedite its delivery.</p> <p>Persimmon and NUL have also agreed a Statement of Common Ground ("SoCG") (which can be found at Document EX/NBC/04, p.181, of the Examination Documents) which demonstrates agreement between these parties that Site TB23 is suitable and deliverable.</p> <p>The remainder of these representations comment on the proposed changes to Policy TB23 in the context of discussion in relation to the site during the Hearings and post-Hearing correspondence.</p> <p>Modifications to Site TB23 are proposed under MM108 and, for ease, are set out as follows: <i>Officer note: for brevity reasons, the changes proposed under MM108 are not duplicated here</i></p> <p>Persimmon fully supports the Main Modifications to Site TB23 and is currently preparing a detailed planning application that reflects and addresses the proposed policy requirements, and which is proposed to be submitted early in 2026, in readiness for the Local Plan being adopted (should it be found sound). This further demonstrates the deliverability of the site and Persimmon's commitment to bringing the site forward as early as practicable (which was discussed at Local Plan Examination).</p> <p>In relation to the modifications proposed, Persimmon makes the following comments:</p> <ol style="list-style-type: none"> 1. Deletion of Policy SA1 (and reference) – as set out in Persimmon's Regulation 19 representations and Hearing Statements, the removal of Policy SA1 is fully supported. Persimmon considered that this policy was overly prescriptive and constituted duplication of other general development management policies in the Local Plan, creating a risk of delay to the delivery of housing allocations. 2. Deletion of Walleys Quarry closure date – Persimmon fully supports the removal of this date, and notes that Walleys Quarry has now ceased disposal of hazardous waste, with the Environment Agency taking steps toward remediation. Persimmon has extensive experience in understanding the issues relating to Walleys Quarry and has successfully delivered development adjacent to Site TB23 at the Hamptons (immediately to the south) and Milliners Green (immediately to the west), which demonstrate Persimmon's ability to deliver high quality homes in this location. Moreover, Persimmon also notes that since the cessation waste disposal at Walleys Quarry early in 2025, the level of odour issues has continued to reduce dramatically during the course of 2025. A planning application on the site will fully address this

	<p>requirement and Persimmon is undertaking a robust odour assessment in accordance with Clause 4 of Policy TB23.</p> <p>3. Inclusion of the requirement for a site specific Flood Risk Assessment with mitigation to reduce flood risk – Persimmon supports this policy requirement and has commissioned the flood risk assessment work required to address this policy, as part of the preparation of a planning application. This detailed site-specific flood risk assessment work has informed a deliverable scheme layout for the site – in accordance with the key policies in the emerging Local Plan (including policies SE3 and SE4). Based on this ongoing assessment work, the site will be delivered in full compliance with Part 5 of Policy TB23.</p> <p>4. Minor amendments – Persimmon supports the minor wording clarifications to remedy text errors in the policy.</p> <p>In summary, Persimmon fully supports the allocation of site TB23 (Land West of Galingale View) in the Local Plan, and supports the Main Modifications proposed. The site is in a highly accessible location and will provide the quality, type and mix of homes that will support growth on the western edge of the Newcastle-under-Lyme Strategic Centre, underpinning the growth of key regional employers such as Keele University and the Keele University Science and Innovation Park.</p> <p>As has been demonstrated in across Persimmon's representations, and will be reinforced by the preparation of a detailed planning application, the site is inherently deliverable: being available, suitable and achievable in the context of the NPPF. Furthermore, the site can deliver significant economic, social and environmental benefits on an underutilised site that forms a natural and logical extension to Persimmon's successful developments at Milliners Green and The Hamptons, which lie immediately adjacent to the site.</p>
Comment ID	32
Response Date	09/12/2025 15:36:00
Consultee Company / Organisation	Persimmon Homes (North West) Limited
Agent Company / Organisation	Asteer Planning LLP
Agent Family Name	Power
Agent Given Name	Jon
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM04
Q4page - Page	4 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4polycypara - Policy / Paragraph	Policy PSD1: Overall Development Strategy)
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The Main Modifications suggest a reduction in the overall housing land supply in the emerging Local Plan, which includes: 1. A reduction in the overall housing land supply by 238 - from a supply of 8,663 dwellings (Submission Plan) to 8,425 dwellings (Main Modifications) – Ref: MM04. 2. The removal of strategic allocations due to issues identified by the Inspector in relation to deliverability, including: a. Site AB12 - Land East of Diglake Street (125 dwellings) – Ref: MM08; and b. Site AB33 - Land Off Nantwich Road / Park Lane, Audley (55 dwellings) – Ref: MM71. 3. A housing land supply buffer which is only marginally in excess of 5%, which provides limited safeguards against any under delivery or deliverability issues.</p> <p>It is also noted that the Inspector has raised issues with other major allocations, which places further focus on the narrow supply buffer and loss of proposed site allocations (subject to the Inspector's final findings).</p> <p>Persimmon consider there are other clear and compelling reasons why the Council should be more ambitious with its housing requirement and, as a minimum, should include a more robust buffer in the context of a reduced housing land supply, including: - An employment land target of 63 ha, which would generate a significantly higher number of jobs than could be sustained by the 400 dpa housing target. - The Council argue that not all new jobs from the strategic employment sites will be taken up by local residents requiring new housing in NUL; however, no agreement is in place with any of NUL's neighbouring authorities to take on board any of its unmet need for in-commuters. - The revised housing requirement in the National Planning Policy Framework ("NPPF") has seen NUL's housing need increasing from 330 dpa to 550 dpa. This figure is also 38% higher than the emerging Local Plan figure of 400 dpa and is indicative of a radical change in housing policy which could have significant implications once the Plan Period is 5 years old. - The Council's evidence base points to an acute need for affordable housing within the Borough, with the net affordable housing need equating to 278 dpa, or c.70% of the annual dwelling growth required by the Council's Housing and Economic Needs Assessment ("HENA"). A sufficient housing requirement, and deliverable / viable sites, are necessary to help deliver as much of these affordable housing needs as possible. - There is a need for 15-16 care home bedspaces per annum as well as an annual need for 32 units of sheltered accommodation p.a.; 5 enhanced sheltered homes annually; and 6 additional Extra Care homes p.a. No provision is made in the emerging Local Plan to meet this C2 need, which should be additional to the C3 housing requirement of 400 dpa. - The 400 dpa housing requirement figure makes no allowance for Keele University's expansion plans to 2040. The University aims to increase its student numbers by 6,795 between 2022 and 2040, but only has plans for an additional 1,300 student rooms on campus. There should be at least 500 additional C3 dwellings (25 dpa) provided in NUL to address increased student demand.</p>

	<p>Whilst Persimmon consider there is justification to pursue a housing requirement figure in excess of the minimum LHN, and indeed the 400 dpa recommended in the HENA and taken forward in the emerging Local Plan; as a minimum, a sufficient buffer in the Local Plan's housing land supply should be considered to ensure that the Council mitigates against under delivery, additional specialist / student need and employment growth across the Plan Period – which would support a sound Local Plan.</p> <p>One way to address this issues would be to identify additional sites through this Local Plan, by way of further Main Modifications, that are demonstrated to be deliverable in the first 5 years of the Plan Period.</p> <p>Site KL21 (land to the east and west of Quarry Bank Road) offers an opportunity to bring forward a deliverable site early in the Plan Period that will support the growth of the University Growth Corridor, provide deliverable homes in line with a significantly increased housing requirement in the revised NPPF and deliver a range of economic, social and environmental benefits on a site that will significantly contribute to meeting the needs of the Borough.</p> <p>Should the Inspector be minded to require the Council to identify additional sites, or should additional sites be removed from the Plan, site KL21 presents an opportunity to boost housing supply and deliver sustainable growth in the University Growth Corridor.</p> <p>To be effective and consistent with national policy, Persimmon consider that the Plan Period should, as a minimum, be extended cover a period up to 2041. Even if it is found sound, the Local Plan will likely not be adopted until Spring 2026 at the earliest and, therefore, its strategic policies to 2040 would not be consistent with the National Planning Policy Framework ("NPPF"), which expects Development Plans to look ahead over a minimum 15 year period from adoption. If the Plan Period was modified to cover the period 1 April 2024 to 31 March 2041, the requirement for an additional buffer in housing land supply should be considered.</p> <p>Annex 1 of the new NPPF (December 2024), sets out the transitional arrangements for plan making, noting that Local Plans submitted before 12th March 2025 would be examined under the previous (2023) NPPF. Whilst the Council submitted its plan to satisfy these transitional arrangements (subject to it being found sound), Paragraph 236 of the NPPF states: "Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need".</p> <p>Based on the Government's new Standard Method, NUL's housing requirement has risen to 550 dwellings per annum ("dpa") based on the Government's implemented changes to the Standard Method for calculating Local Housing Needs ("LHN") – this compares to: - A 330 dpa requirement using the 2023 Standard Method for calculating LHN – representing an increase of 220 dpa or a 67% uplift; and - A 400 dpa requirement based on the Submission Plan - representing an increase of 150 dpa or a 38% uplift – therefore falling significantly short of the 550 dpa figure in the new Standard Method for calculating LHN.</p> <p>Based on the above, NUL will only be delivering 73% of its updated LHN using the new Standard Method, and therefore triggers the need for an immediate review of the Local Plan once it is adopted (if it is found sound). Persimmon therefore recommend that, as a minimum, a Main Modification should be made to the Submission Plan to implement a robust review trigger, to ensure consistency with National Policy.</p> <p>This Main Modification should be included in Appendix 1 (Monitoring Framework) of the Local Plan and trigger the requirement for the commencement and completion of an immediate full review of the Local Plan following adoption. This must include clear timelines and milestones, and stringent penalties if the Council fails to progress an appropriate Local Plan within a reasonable timescale.</p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Should the Inspector be minded to require the Council to identify additional sites, or should additional sites be removed from the Plan, site KL21 presents an opportunity to boost housing supply and deliver sustainable growth in the University Growth Corridor.</p> <p>To be effective and consistent with national policy, Persimmon consider that the Plan Period should, as a minimum, be extended cover a period up to 2041. Even if it is found sound, the Local Plan will likely not be adopted until Spring 2026 at the earliest and, therefore, its strategic policies to 2040 would not be consistent with the National Planning Policy Framework ("NPPF"), which expects Development Plans to look ahead over a minimum 15 year period from adoption. If the Plan Period was modified to cover the period 1 April 2024 to 31 March 2041, the requirement for an additional buffer in housing land supply should be considered.</p> <p>Annex 1 of the new NPPF (December 2024), sets out the transitional arrangements for plan making, noting that Local Plans submitted before 12th March 2025 would be examined under the previous (2023) NPPF. Whilst the Council submitted its plan to satisfy these transitional arrangements (subject to it being found sound), Paragraph 236 of the NPPF states: "Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need".</p> <p>Based on the Government's new Standard Method, NUL's housing requirement has risen to 550 dwellings per annum ("dpa") based on the Government's implemented changes to the Standard Method for calculating Local Housing Needs ("LHN") – this compares to: - A 330 dpa requirement using the 2023 Standard Method for calculating LHN – representing an increase of 220 dpa or a 67% uplift; and - A 400 dpa requirement based on the Submission Plan - representing an increase of 150 dpa or a 38% uplift – therefore falling significantly short of the 550 dpa figure in the new Standard Method for calculating LHN.</p> <p>Based on the above, NUL will only be delivering 73% of its updated LHN using the new Standard Method, and therefore triggers the need for an immediate review of the Local Plan once it is adopted (if it is found sound). Persimmon therefore recommend that, as a minimum, a Main Modification should be made to the Submission Plan to implement a robust review trigger, to ensure consistency with National Policy.</p>

	<p>This Main Modification should be included in Appendix 1 (Monitoring Framework) of the Local Plan and trigger the requirement for the commencement and completion of an immediate full review of the Local Plan following adoption. This must include clear timelines and milestones, and stringent penalties if the Council fails to progress an appropriate Local Plan within a reasonable timescale.</p>
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Comment ID	156
Response Date	17/12/2025 15:14:00
Consultee Company / Organisation	Audley Parish Council
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Please find attached document comprising:</p> <ol style="list-style-type: none"> 1 Statement on behalf of Audley Rural Parish Council 2 Appendix 1 - Map showing distance to Craddocks Moss and Cranberry Bogs from AB2 3 Appendix 2- Pictures of some of the accidents between December 2024 to 4th November 2025 at the A500 Audley Slip Road 4 Appendix 3 - Personal Injury Collision Cluster Analysis <p>The Parish Council continues to find that the allocation of the site for development is flawed and if carried forward to the adoption would render the local plan as unsound.</p> <p>It is considered that the proposed modifications continue the failure to address the following issues:</p> <ul style="list-style-type: none"> • The failure to demonstrate exceptional circumstances for the release of land in the Green Belt • The failure to recognise the harm to the purposes and objectives and purposes of the Green Belt. • Over reliance on challengeable evidence relating to employment land need. • Failure to fully address issues relating to the delivery of the site – in terms of infrastructure provision in general and transport infrastructure in particular. • Failure to take account of the cumulative impacts of the allocation in terms of ecology, heritage and flood risk. <p>It remains the consideration of the Parish Council that the main modifications presented for consultation fail to address the fundamental flaws in the proposed allocation of site AB2 for development.</p> <p>The site makes a significant contribution to the purposes and objectives of the Green Belt.</p> <p>Modification relating to the site continues to rely on levels of need which are not fully evidence and which sacrifice Green Belt in the Borough on the basis of assumed sub regional need. Pressure to develop the site is generated by developer demand rather than clearly evidenced need. The examining Inspector clearly has reservations in this regard, questioning the likely soundness of the plan if the allocation were to proceed as tabled to the examination.</p> <p>MM67 fails to address fundamental issues relating to landscape, heritage, ecology and drainage, merely presenting criteria to be added to an amended policy relating to the allocated site which assumes that these matters can be addressed.</p> <p>It can only be concluded that the examining Inspector's conclusion that the plan as submitted is not sound is not resolved by the main modifications which are the subject of this consultation.</p> <p>It is the Parish Council's contention that the only basis for modification to make the plan sound would be the deletion of the AB2 allocation.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	It is the Parish Council's contention that the only basis for modification to make the plan sound would be the deletion of the AB2 allocation.
Attachments	1341979_AudleyRPC_Appendix 2_A500 Audley sliproad crash photos.pdf 1341979_AudleyRPC_Appendix 3_Collision Cluster Analysis.pdf 1341979_AudleyRPC_Appendix 1_Craddocks Moss and Cranberry Bogs Map.pdf 1341979_AudleyRPC_AB2 Statement.pdf

Comment ID	18
Response Date	26/11/2025 16:40:00
Consultee Given Name	McCarthy Stone
Agent Company / Organisation	The Planning Bureau Limited
Agent Position	Group Planning Associate
Agent Family Name	Styles
Agent Given Name	Natasha
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM13
Q4page - Page	13 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 7 Housing
Q4polycypara - Policy / Paragraph	HOU 1 Affordable Housing
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector.</p> <p>Please find below our comments on the main modifications consultation.</p> <p>We support MM13 and MM14 in its proposed exemption to affordable housing for a number of types of housing including build to rent homes, specialist accommodation including that for purpose built accommodation for the elderly or students, self-build housing and sites exclusively for affordable housing. We also support the acknowledgement that this approach recognises the specific viability considerations for such schemes. This Main Modification will make the plan justified, effective and consistent with national policy.</p>
Comment ID	19
Response Date	26/11/2025 16:40:00
Consultee Given Name	McCarthy Stone
Agent Company / Organisation	The Planning Bureau Limited
Agent Position	Group Planning Associate
Agent Family Name	Styles
Agent Given Name	Natasha
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM14
Q4page - Page	14 of Schedule of Main Modification
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 7 Housing
Q4polycypara - Policy / Paragraph	HOU 1 Affordable Housing
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector.</p> <p>Please find below our comments on the main modifications consultation.</p> <p>We support MM13 and MM14 in its proposed exemption to affordable housing for a number of types of housing including build to rent homes, specialist accommodation including that for purpose built accommodation for the elderly or students, self-build housing and sites exclusively for affordable housing. We also support the acknowledgement that this approach recognises the specific viability considerations for such schemes. This Main Modification will make the plan justified, effective and consistent with national policy.</p>

Comment ID	119
Response Date	16/12/2025 10:44:00
Consultee Company / Organisation	Silverdale Parish Council
Consultee Position	Chairman
Consultee Family Name	Adamczuk
Consultee Given Name	Henryk
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM90
Q4page - Page	135 – 136 (pgs 143 - 147 of the PDF version)
Q4policypara - Policy / Paragraph	Policy SP11 (Lyme Park, Silverdale) and Figure 3
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>'To add criteria 17 to the policy, as follows:- Financial contributions to the delivery of infrastructure and ongoing maintenance of the Countryside Park.'</p> <p>The lack of definitive areas of each parcel risks creating an incentive to the developer to encroach the green belt of the Countryside Park.</p> <p>The Main Modification is silent on the acreage of land proposed for development within each independent parcel known as SP11(1), SP11(2), SP11(3) and SP11(4) and the acreage of land retained within the green belt on the boundary of Silverdale and Keele parishes. Only the total area is quoted (75.74 ha).</p> <p>The Housing Trajectory which accompanied the Main Modifications does not record the sizes of each parcel -although each accommodates at least 100 dwellings. All other sites in the Newcastle under Lyme Housing Trajectory are given a calculated area in hectares.</p> <p>Silverdale Parish Council agrees with criteria but considers it is poor land ownership practice to not specify the sizes of large land parcels (and the corresponding size of green belt to be retained) when the stated intension is to create a Countryside Park and dispose of the development land without planning permission.</p> <p>The development period is also a factor. It is vital to have strong borders to the Countryside Park capable of following topographical features over the decade of upheaval initially without occupied buildings providing local surveillance.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The area of land at SP11(3) should be calculated along with the other parcels in the Housing Trajectory. The area retained for the Country Park should be published. This would achieve clarity and openness and mitigate the incentive risk to the developer.</p>
Comment ID	120
Response Date	16/12/2025 10:44:00
Consultee Company / Organisation	Silverdale Parish Council
Consultee Position	Chairman
Consultee Family Name	Adamczuk
Consultee Given Name	Henryk

Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM90
Q4page - Page	135-136 (pgs 143-147 of the PDF version)
Q4policypara - Policy / Paragraph	Policy SP11 (Lyme Park, Silverdale) and Figure 3
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The Cow Field (shown in orange at p63), a salient consisting only of agricultural land, bordered by Cemetery Road and Keele Road is designated as a Protected Open Space under the Proposals.</p> <p>It is not sound for the reason that it is not logical to take land out of the green belt and provide a less protected designation.</p> <p>In other words, the isolation of the Cow Field as POS been created without a planning rationale.</p> <p>There is an environmentally sensitive area with the Cowfield adjacent to Park Road.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p><u>Silverdale Modification Proposal</u></p> <p>Designate the Cow Field, shown on p63 of the Schedule as green belt land.</p> <p>Create links to the environmental sensitive areas within the Cowfield through the Countryside Park.</p> <p>Several strands of buffer zone could be incorporated to create an environmentally sustainable green belt.</p>
Comment ID	121
Response Date	16/12/2025 10:44:00
Consultee Company / Organisation	Silverdale Parish Council
Consultee Position	Chairman
Consultee Family Name	Adamczuk
Consultee Given Name	Henryk
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM91
Q4page - Page	146 (pgs 143 of the PDF version)
Q4policypara - Policy / Paragraph	Policy SP11 (Lyme Park, Silverdale) and Figure 3
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>13.173 An internal link road that runs between the two sites accessed via Keele Road and the Ashbourne Drive link roads should be sensitively designed to reflect the landscape and wider setting and to discourage external through movements (i.e. rat running) through the site.</p> <p>To ensure the effectiveness of the plan.</p> <p>These 2 paragraphs are unsound because</p> <p>1 It is unclear which sites are being connected.</p> <p>2 A better balance needs to be struck as there is an apparent conflict with policy expressed elsewhere (Lepus Consulting p A48) under Main Modification</p> <p>'Enhancing and extending existing green corridors, ..., to support</p>

	<p>biodiversity, active travel, and connections between communities and nature'.</p> <p>Example is the protection of Jobs Wood as a Geological Site leaves one access road for SP11(4).</p> <p>3 The proximity of road congestion at the following should be assessed under Infrastructure: Silverdale Primary Academy accessed in Racecourse for SP11(4) and SP23 Silverdale High Street/Sneyd Terrace access to Ashbourne Drive for SP11(3)</p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p><u>Silverdale Modification Proposal</u></p> <p>An internal link road that runs between the sites at SP11 (1), SP11 (2) and SP11 (3). It should be sensitively designed to reflect the landscape, including conservation of woodland and wetland habitats and the wider setting and to discourage external through movements (i.e. rat running) through the site. The impact on neighbouring streets in Silverdale should be assessed for highways improvements. See Appendix 1. Staffordshire County Traffic Data Report 2025</p>
<p>FileAttachment - 8. If you have a filled-in representation form or other file that you wish to attach, you may add it here:</p>	<p>6549507</p>
<p>Attachments</p>	<p>1395941 photos .png</p>

Comment ID	40
Response Date	12/12/2025 12:07:00
Consultee Company / Organisation	Allied Bakeries
Consultee Family Name	Allied Bakeries
Agent Company / Organisation	Rapleys LLP
Agent Position	Associate Planner
Agent Family Name	Hirose
Agent Given Name	Wakako
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	23
Q4page - Page	46
Q4chap - Chapter, Appendix Number or Map Inset	8 Employment
Q4policypara - Policy / Paragraph	EMP2
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We are broadly in support of the proposed main modification to Policy EM2. However, the policy requires that in addition to criteria a) and d), both criteria b) and c) are required to be satisfied in order to justify alternative uses on Existing Employment Sites.</p> <p>Criterion b) requires the applicant to demonstrate that the land or building has no realistic prospect of re-use or redevelopment for employment use with marketing evidence. Criterion c) requires that the loss of land or building would not adversely affect economic growth and employment opportunities in the local area. Where criterion b) is satisfactorily demonstrated by marketing evidence, it is not clear how criterion c) can be demonstrated. A site which is demonstrated to have no reasonable prospect of re-use or redevelopment for employment use cannot contribute to economic growth or provide employment opportunities. Therefore, criterion c) is not relevant and unreasonable where criterion b) is satisfied. As such, we consider that in terms of criteria b) and c), the policy should require one of the criteria to be satisfied i.e. b) or c) (in addition to the other criteria (as modified) under Policy EMP2).</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>We are broadly in support of the proposed main modification to Policy EM2. However, the policy requires that in addition to criteria a) and d), both criteria b) and c) are required to be satisfied in order to justify alternative uses on Existing Employment Sites.</p> <p>Criterion b) requires the applicant to demonstrate that the land or building has no realistic prospect of re-use or redevelopment for employment use with marketing evidence. Criterion c) requires that the loss of land or building would not adversely affect economic growth and employment opportunities in the local area. Where criterion b) is satisfactorily demonstrated by marketing evidence, it is not clear how criterion c) can be demonstrated. A site which is demonstrated to have no reasonable prospect of re-use or redevelopment for employment use cannot contribute to economic growth or provide employment opportunities. Therefore, criterion c) is not relevant and unreasonable where criterion b) is satisfied. As such, we consider that in terms of criteria b) and c), the policy should require one of the criteria to be satisfied i.e. b) or c) (in addition to the other criteria (as modified) under Policy EMP2).</p>

Comment ID	15
Response Date	04/12/2025 11:08:00
Consultee Family Name	Austin
Consultee Given Name	Jim
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	04
Q4page - Page	B4
Q4chap - Chapter, Appendix Number or Map Inset	SA_MM_stage.PDF
Q4policypara - Policy / Paragraph	5.3
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The proposed modification is, on its face, legally compliant; however, it remains fundamentally unsound. The modification itself—particularly paragraph 5.3— demonstrates why. The Borough requires a minimum of 63 hectares of strategic employment land. Even with the full removal of the AB2 site (80 hectares), the Plan would still retain 68.94 hectares, exceeding the minimum requirement by 5.94 hectares. This unequivocally shows that AB2 is not required to meet strategic employment needs.</p> <p>Given this surplus, the exceptional circumstances needed to justify development in the Green Belt—especially those relying on alleged regional economic necessity—collapse entirely. With adequate strategic employment provision secured without AB2, the allocation no longer meets the NPPF tests of justification or exceptional circumstances. The only sound conclusion is the complete removal of AB2 from the Local Plan. Moreover, there are two other sites within a short distance capable of accommodating a 1 million sq ft B8 warehouse. 1.2 million sq ft is consented for at Chatterley Valley with a 106-acre footprint (1 million sq ft ~ 23 acres). Alternatively, there is Radway16 at Radway Green with consent for 1.0-1.8 million sq ft of warehouse/logistics space. Both of these sites are within 10 miles of AB2 – another factor rendering AB2 redundant.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In the right most column “Does the modification result in a significant change requiring further assessment?” should state: “Yes – the proposed modification deletes Policy AB2 which removes a strategic site allocation that was assessed in the Regulation 19 SA. The modification has been assessed in the Main Modifications SA Report.”
Comment ID	17
Response Date	04/12/2025 11:08:00
Consultee Family Name	Austin
Consultee Given Name	Jim
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	70
Q4page - Page	B44
Q4chap - Chapter, Appendix Number or Map Inset	SA_MM_Stage.pdf
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant	At the time the planning inspector began her examination of the Local Plan, the enabling development supporting restoration of Madeley Manor had not been passed. Since this enabling development has now been passed on appeal (APP/P3420/W/25/3363903) allowing the building of 39 executive homes

or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	in the green belt, AB15 earmarked for 33 dwellings has now been made redundant. Since the enabling development for Madeley Manor has now been approved, the housing proposal for AB15 could therefore be removed without compromising the housing need for the Borough. Further, justification for allocating this site for housing was based on the assumption that it did not contribute to the green belt. The photomontage below, taken on 03/12/2025 clearly show this to be in error as it forms part of the agricultural activity within the community.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	In the right most column "Does the modification result in a significant change requiring further assessment?" should state: "Yes – the proposed modification deletes Policy AB15 which removes a residential site allocation that was assessed in the Regulation 19 SA. The modification has been assessed in the Main Modifications SA Report."
FileAttachment - 8. If you have a filled-in representation form or other file that you wish to attach, you may add it here:	6547831
Attachments	1299830 Dr J Austin photos .png
Comment ID	16
Response Date	04/12/2025 11:08:00
Consultee Family Name	Austin
Consultee Given Name	Jim
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	67
Q4page - Page	B40
Q4chap - Chapter, Appendix Number or Map Inset	SA_MM_Stage.pdf
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The points below highlight outstanding issues within policy MM67. These relate to</p> <ul style="list-style-type: none"> • Highways and Transport • HGV Movements and the Lorry Park • Masterplanning Requirement • Landscape and Visual Harm • Sustainable Transport <p>These are dealt with in turn.</p> <p>1. Highways and Transport – Critical Evidence Missing, Impacts Unquantified</p> <p>The modification expands Criterion 7 to require extensive on- and off-site mitigation, financial contributions, and a future micro simulation model agreed with multiple authorities. These additions inadvertently expose the depth of the unresolved issues:</p> <ul style="list-style-type: none"> • The traffic evidence used at Examination was incomplete and out of date, especially concerning the already over-capacity two-level junction at M6 Junction 16. • Essential modelling—specifically a micro-simulation study critical for understanding the effects of a major logistics operation—has been deferred until after adoption. • No specific, deliverable mitigation for J16 or surrounding rural roads is identified. • No meaningful assessment of proposed emergency access points on Moat Lane or Barthomley Road. <p>This demonstrates that the Council has not yet understood the traffic impacts, let alone produced a deliverable mitigation strategy. The Inspector expressed concern regarding the scale of AB2 and effectively granted the Council "the benefit of the doubt," yet the evidence now confirms that doubt is well founded. Requiring extensive post-adoption studies is inherently unsound: a site cannot be judged deliverable when its fundamental impacts remain untested. Furthermore, upgrading J16 to a three-level grade-separated junction—an extraordinarily costly (£40-100 million) and unnecessary national expenditure—would become inevitable if AB2 were pursued. This alone removes any rational justification for the allocation.</p>

	<p>2. HGV Movements and the Lorry Park – Impacts Not Assessed The new requirement for Park Mark Freight accreditation tacitly acknowledges high-intensity HGV movements and related crime and amenity concerns. Yet the Plan still provides:</p> <ul style="list-style-type: none"> • No quantified HGV trip forecasts • No assessment of night-time or 24/7 operations • No evaluation of the impact on J16 slip roads, local villages, or rural lanes <p>Such omissions violate the NPPF requirements for justification (para 31) and transport assessment (para 104). A strategic employment site dominated by logistics activity cannot be allocated without this baseline evidence.</p> <p>3. Masterplanning Requirement – Evidence of Prematurity and Non-Deliverability The introduction of a requirement for an entirely new comprehensive masterplan at this stage demonstrates that the Council has not yet assessed:</p> <ul style="list-style-type: none"> • Internal site layout • Infrastructure constraints • Environmental and design limitations • Cross-boundary transport dependencies <p>A site that needs wholesale re-evaluation during Main Modifications is, by definition, not yet proven deliverable.</p> <p>4. Landscape and Visual Harm – Impacts Unassessed and Likely Significant MM67 strengthens the requirement for a Landscape and Visual Impact Assessment and a “landscape-led layout,” implicitly acknowledging significant anticipated harm. Yet:</p> <ul style="list-style-type: none"> • No LVIA has been completed before allocation. • The magnitude of visual and landscape damage from an 80-hectare warehousing complex remains unknown <p>A site with such evident potential for major landscape harm cannot be considered justified or consistent with national policy when its effects remain unquantified.</p> <p>5. Sustainable Transport – Modifications Confirm the Site Is Unsustainable The expanded requirements for travel plans, cycle routes, new bus services, demand-responsive transport, long-term viability assessments, and cross-boundary connectivity confirm that:</p> <ul style="list-style-type: none"> • The site is not in a sustainable location; • Existing public transport provision is wholly inadequate; • Substantial, ongoing, and speculative interventions would be required merely to approach acceptability. <p>These demands demonstrate that the site does not meet the NPPF’s expectations for sustainable travel and therefore fails the tests of justification and effectiveness.</p> <p>Conclusion The expanded evidence now available—much of it revealed because of, not in spite of, Main Modification MM67—makes clear that Policy AB2 is unsound. The modification:</p> <ul style="list-style-type: none"> • Confirms that essential evidence on highways, HGV movements, landscape, and transport has not been completed; • Relies on extensive future studies instead of demonstrating soundness now; • Fails to identify deliverable mitigation; • Fails the NPPF tests of justification, effectiveness, and consistency with national policy; and • Reveals the allocation to be unnecessary, given that removing AB2 leaves the Borough exceeding its strategic employment requirement (see comments on MM04). <p>I would therefore respectfully submit that the Inspector should:</p> <ol style="list-style-type: none"> 1. Remove AB2 from the Local Plan in its entirety, or 2. Require the Council to prepare and publish all essential evidence— including highways micro-simulation modelling, detailed HGV forecasting, a pre-allocation LVIA, and a full sustainable transport feasibility assessment— before any consideration of adoption. <p>I would welcome the opportunity for further engagement on this matter.</p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>In the right most column “Does the modification result in a significant change requiring further assessment?” should state: “Yes – the proposed modification deletes Policy AB2 which removes a strategic site allocation that was assessed in the Regulation 19 SA. The modification has been assessed in the Main Modifications SA Report.”</p>

Comment ID	80
Response Date	15/12/2025 09:36:00
Consultee Company / Organisation	Sport England
Consultee Position	Planning Manager
Consultee Family Name	Bahey
Consultee Given Name	Rajvir
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	AM17
Q4page - Page	8 of Additional Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Introduction to Knutton
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Sport England are supportive of the removal of the allocation of KS3 Land at Blackbank Road with the loss of playing field land not being demonstrated to be surplus to requirement and the replacement provision not being at least equivalent in quantity and quality to that proposed to be lost, in line with NPPF paragraph 104.

Comment ID	184
Response Date	17/12/2025 21:08:00
Consultee Company / Organisation	Snack In The Box
Consultee Position	Parts & Technical Manager
Consultee Family Name	Barnish
Consultee Given Name	Steve
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD5 Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>I also support Modification MM08, which removes site CT1 (Land at Red Street and High Carr Farm). This change avoids the significant transport and environmental impacts that would have arisen from the 530 dwellings initially proposed.</p>
Comment ID	183
Response Date	17/12/2025 21:08:00
Consultee Company / Organisation	Snack In The Box
Consultee Position	Parts & Technical Manager
Consultee Family Name	Barnish
Consultee Given Name	Steve
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	68 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB12
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>To begin with, I wish to express my support for a number of modifications that directly benefit Audley Parish. Modification MM69, which removes the allocation of AB12 (Land East of Diglake Street), is fully welcomed, as the proposed 125 dwellings would have imposed unsustainable pressure on local infrastructure, highways, and the surrounding Green Belt landscape.</p>
Comment ID	185
Response Date	17/12/2025 21:08:00
Consultee Company / Organisation	Snack In The Box
Consultee Position	Parts & Technical Manager
Consultee Family Name	Barnish
Consultee Given Name	Steve
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM05

Q4page - Page	7 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD3
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>Furthermore, Modification MM05, which reduces the overall housing requirement for Audley and Bignall End from 250 to 110 dwellings, reflects the removal of these sites and will help to protect the rural character and environmental quality of the area. However, I would have liked the modifications to go further in removing all proposed housing sites in the Audley area to reflect the views of residents and preserve its rural character.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	I would have liked the modifications to go further in removing all proposed housing sites in the Audley area to reflect the views of residents and preserve its rural character.
Comment ID	187
Response Date	17/12/2025 21:08:00
Consultee Company / Organisation	Snack In The Box
Consultee Position	Parts & Technical Manager
Consultee Family Name	Barnish
Consultee Given Name	Steve
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM68
Q4page - Page	47 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 Supporting Information
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>Despite these positive steps, I must express strong concerns regarding the continued inclusion of AB2 (Land at Junction 16 of the M6) within the Local Plan. Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues previously identified by the Inspector during examination. Serious concerns remain regarding the scale of the development, the lack of complete and up-to-date highways evidence, the uncertainty surrounding deliverability, and the absence of clarity regarding required mitigation. In addition, MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the retention of AB2 in the Plan is premature, unjustified, and insufficiently evidenced. The site should not be included until all outstanding matters are fully addressed.</p> <p>The modifications introduce a requirement for micro-simulation transport modelling (as part of MM67), which I welcome in principle. However, it is deeply concerning that this modelling is not required to be completed before the Local Plan is adopted. Access to AB2 is highly likely to necessitate a grade-separated flyover, given that every Staffordshire junction on the A500 is grade-separated other than the large roundabout at the M6. A scheme of this scale would involve substantial infrastructure investment, creating significant viability implications that have not yet been tested or published. The transport data currently relied upon is considerably out of date and does not reflect the daily congestion, queueing, and hazards experienced on the A500, its slip roads, or the rural road network through the Audley parish. Without complete and robust transport modelling, it is not possible to consider AB2 sound or deliverable.</p> <p>I must also raise concerns regarding the reference to “emergency access” via Moat Lane within the amended policy. MM67 requires clarification on this point, but none has been provided. Any reference to emergency access must clearly state that Moat Lane is to be used strictly for blue-light emergency vehicles only, and not for HGVs, employee vehicles, or diverted traffic in the event that primary access</p>

	<p>from the A500 becomes unavailable. Without explicit wording in the modification text, the risk of unintended and inappropriate traffic displacement remains high and unacceptable.</p> <p>Additionally, I note that MM67 refers to measures intended to “discourage” the routing of traffic near Black Firs and Craddock’s Moss SSSIs. While this is welcome in principle, the modification provides no detail as to what these measures are, how they will operate, or how they will prevent HGVs and commercial traffic from impacting these sensitive ecological sites. Given their importance, such measures must be defined, tested, and presented before the Local Plan is adopted.</p> <p>I welcome the strengthened requirement for a landscape and visual impact assessment within MM67; however, I must object strongly to the replacement of the existing large area of open green space between footpaths Audley 9 and Audley 22 with narrow “green corridors”. These corridors, enclosed by substantial warehouse buildings, cannot replicate the value of open green space in terms of biodiversity, landscape character, or public amenity. They will not support farmland birds that rely on open fields for survival, nor will they provide the recreational or environmental quality currently offered by the open landscape. This modification undermines the principle of a landscape-led masterplan and should be revised immediately.</p> <p>Given the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her Final Report and resist progressing any planning applications relating to AB2 until all highways modelling is fully completed and published, all required mitigation is costed and independently reviewed, viability is reassessed in light of potentially significant infrastructure requirements, and full community and stakeholder consultation has taken place on the finalised evidence. This approach is essential to ensuring the soundness, effectiveness, and deliverability of any future development proposal.</p> <p>Thank you for considering my representation. I trust that these matters will be given full and careful attention as part of the examination process.</p>
Comment ID	186
Response Date	17/12/2025 21:08:00
Consultee Company / Organisation	Snack In The Box
Consultee Position	Parts & Technical Manager
Consultee Family Name	Barnish
Consultee Given Name	Steve
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>Despite these positive steps, I must express strong concerns regarding the continued inclusion of AB2 (Land at Junction 16 of the M6) within the Local Plan. Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues previously identified by the Inspector during examination. Serious concerns remain regarding the scale of the development, the lack of complete and up-to-date highways evidence, the uncertainty surrounding deliverability, and the absence of clarity regarding required mitigation. In addition, MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the retention of AB2 in the Plan is premature, unjustified, and insufficiently evidenced. The site should not be included until all outstanding matters are fully addressed.</p> <p>The modifications introduce a requirement for micro-simulation transport modelling (as part of MM67), which I welcome in principle. However, it is deeply concerning that this modelling is not required to be completed before the Local Plan is adopted. Access to AB2 is highly likely to necessitate a grade-separated flyover, given that every Staffordshire junction on the A500 is grade-separated other than the large roundabout at the M6. A scheme of this scale would involve substantial infrastructure investment, creating significant viability implications that have not yet been tested or published. The transport data currently relied upon is considerably out of date and does not reflect the daily congestion, queueing, and hazards experienced on the A500, its slip roads, or the rural road network through the Audley parish. Without complete and robust transport modelling, it is not possible to consider AB2 sound or deliverable.</p> <p>I must also raise concerns regarding the reference to “emergency access” via Moat Lane within the amended policy. MM67 requires clarification on this point, but none has been provided. Any reference to emergency access must clearly state that Moat Lane is to be used strictly for blue-light emergency vehicles only, and not for HGVs, employee vehicles, or diverted traffic in the event that primary access from the A500 becomes unavailable. Without explicit wording in the modification text, the risk of unintended and inappropriate traffic displacement remains high and unacceptable.</p> <p>Additionally, I note that MM67 refers to measures intended to “discourage” the routing of traffic near Black Firs and Craddock’s Moss SSSIs. While this is welcome in principle, the modification provides no detail as to what these measures are, how they will operate, or how they will prevent HGVs and commercial</p>

traffic from impacting these sensitive ecological sites. Given their importance, such measures must be defined, tested, and presented before the Local Plan is adopted.

I welcome the strengthened requirement for a landscape and visual impact assessment within MM67; however, I must object strongly to the replacement of the existing large area of open green space between footpaths Audley 9 and Audley 22 with narrow "green corridors". These corridors, enclosed by substantial warehouse buildings, cannot replicate the value of open green space in terms of biodiversity, landscape character, or public amenity. They will not support farmland birds that rely on open fields for survival, nor will they provide the recreational or environmental quality currently offered by the open landscape. This modification undermines the principle of a landscape-led masterplan and should be revised immediately.

Given the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her Final Report and resist progressing any planning applications relating to AB2 until all highways modelling is fully completed and published, all required mitigation is costed and independently reviewed, viability is reassessed in light of potentially significant infrastructure requirements, and full community and stakeholder consultation has taken place on the finalised evidence. This approach is essential to ensuring the soundness, effectiveness, and deliverability of any future development proposal.

Comment ID	22
Response Date	03/12/2025 09:51:00
Consultee Family Name	Barnish
Consultee Given Name	Will
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM66
Q4page - Page	45 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy SA1: General Requirements
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	In addition, MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the retention of AB2 in the Plan is premature, unjustified, and insufficiently evidenced.
Comment ID	23
Response Date	03/12/2025 09:51:00
Consultee Family Name	Barnish
Consultee Given Name	Will
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at Junction 16 of the M6'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Despite these positive steps, I must express strong concerns regarding the continued inclusion of AB2 (Land at Junction 16 of the M6) within the Local Plan. Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues previously identified by the Inspector during examination. Serious concerns remain regarding the scale of the development, the lack of complete and up-to-date highways evidence, the uncertainty surrounding deliverability, and the absence of clarity regarding required mitigation.</p> <p>The modifications introduce a requirement for micro-simulation transport modelling (as part of MM67), which I welcome in principle. However, it is deeply concerning that this modelling is not required to be completed before the Local Plan is adopted. Access to AB2 is highly likely to necessitate a grade-separated flyover, given that every Staffordshire junction on the A500 is grade-separated other than the large roundabout at the M6. A scheme of this scale would involve substantial infrastructure investment, creating significant viability implications that have not yet been tested or published. The transport data currently relied upon is considerably out of date and does not reflect the daily congestion, queueing, and hazards experienced on the A500, its slip roads, or the rural road network through the Audley parish. Without complete and robust transport modelling, it is not possible to consider AB2 sound or deliverable.</p> <p>I must also raise concerns regarding the reference to "emergency access" via Moat Lane within the amended policy. MM67 requires clarification on this point, but none has been provided. Any reference to emergency access must clearly state that Moat Lane is to be used strictly for blue-light emergency vehicles only, and not for HGVs, employee vehicles, or diverted traffic in the event that primary access from the A500 becomes unavailable. Without explicit wording in the modification text, the risk of unintended and inappropriate traffic displacement remains high and unacceptable.</p> <p>Additionally, I note that MM67 refers to measures intended to "discourage" the routing of traffic near Black Firs and Craddock's Moss SSSIs. While this is welcome in principle, the modification provides no detail as to what these measures are, how they will operate, or how they will prevent HGVs and commercial traffic from impacting these sensitive ecological sites. Given their importance, such measures must be defined, tested, and presented before the Local Plan is adopted.</p> <p>I welcome the strengthened requirement for a landscape and visual impact assessment within MM67; however, I must object strongly to the replacement of the existing large area of open green space between footpaths Audley 9 and Audley 22 with narrow "green corridors". These corridors, enclosed by substantial</p>

	warehouse buildings, cannot replicate the value of open green space in terms of biodiversity, landscape character, or public amenity. They will not support farmland birds that rely on open fields for survival, nor will they provide the recreational or environmental quality currently offered by the open landscape. This modification undermines the principle of a landscape-led masterplan and should be revised immediately.
Comment ID	21
Response Date	03/12/2025 09:51:00
Consultee Family Name	Barnish
Consultee Given Name	Will
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	Policy PSD5: Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	I also support Modification MM08, which removes site CT1 (Land at Red Street and High Carr Farm). This change avoids the significant transport and environmental impacts that would have arisen from the 530 dwellings initially proposed.
Comment ID	25
Response Date	03/12/2025 09:51:00
Consultee Family Name	Barnish
Consultee Given Name	Will
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB12 Land East of Diglake Street
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Modification MM69, which removes the allocation of AB12 (Land East of Diglake Street), is fully welcomed, as the proposed 125 dwellings would have imposed unsustainable pressure on local infrastructure, highways, and the surrounding Green Belt landscape.
Comment ID	20
Response Date	03/12/2025 09:51:00
Consultee Family Name	Barnish
Consultee Given Name	Will
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM05
Q4page - Page	7 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	Policy PSD3: Distribution of Development

Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Modification MM05, which reduces the overall housing requirement for Audley and Bignall End from 250 to 110 dwellings, reflects the removal of these sites and will help to protect the rural character and environmental quality of the area. However, I would have liked the modifications to go further in removing all proposed housing sites in the Audley area to reflect the views of residents and preserve its rural character.
Comment ID	24
Response Date	03/12/2025 09:51:00
Consultee Family Name	Barnish
Consultee Given Name	Will
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM68
Q4page - Page	47 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Paragraph 13.6 & 13.19
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues previously identified by the Inspector during examination. Serious concerns remain regarding the scale of the development, the lack of complete and up-to-date highways evidence, the uncertainty surrounding deliverability, and the absence of clarity regarding required mitigation. In addition, MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the retention of AB2 in the Plan is premature, unjustified, and insufficiently evidenced.

Comment ID	160
Response Date	17/12/2025 11:59:00
Consultee Family Name	Barratt
Consultee Given Name	Tina
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM53
Q4page - Page	36 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4policypara - Policy / Paragraph	SE8 Biodiversity and Geodiversity
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MM53</p> <p>Inserting the word SIGNIFICANT and deleting item i (trees, woodlands, hedgerows)</p> <p>How will you quantify what is significant?</p> <p>Trees, woodlands and hedgerows are already severely depleted and require increased protection from development. Without this there is scant hope of maintaining biodiversity let alone increasing it.</p>
Comment ID	162
Response Date	17/12/2025 10:23:00
Consultee Family Name	Barratt
Consultee Given Name	Tina
Q4ref - MM Reference	MM57
Q4page - Page	41 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4policypara - Policy / Paragraph	SE11 Trees, Hedgerows and Woodland
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MM57</p> <p>Amending criteria 7</p> <p>"may include..."</p> <p>The wooliness of this language further weakens important protections.</p> <p>Light pollution needs to be taken much more seriously if the other environmental undertakings are to succeed.</p>

Comment ID	37
Response Date	11/12/2025 13:26:13
Consultee Family Name	Barton
Consultee Given Name	Community Campaigner David
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps Main Modifications Sustainability Appraisal / Habitats Regulations Assessment
Q4ref - MM Reference	MM01
Q4page - Page	2
Q4chap - Chapter, Appendix Number or Map Inset	Strategic Objectives
Q4policypara - Policy / Paragraph	4.8
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.</p> <p>This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.</p> <p>Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.</p> <p>It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.</p> <p>*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.</p> <p>Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.</p> <p>Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes. References to supporting documents are contained in the indented blue numbering.</p> <p>This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.</p> <p>Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.</p> <p>Community Campaigner David Barton:</p> <p>Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.</p> <p>Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton,</p>

Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.

Mr. Barton should like to credit and thank the leading professionals and organisations that continue to support his TVA endeavours including:

- 1) Mr. Francis Shaw- Shaw & Jagger Architects
- 2) The King's Foundation
- 3) Create Streets
- 4) Francis Terry & Associates
- 5) The Institute for Traditional Architecture

This Submission is supported by the following appendices:

- i) Appendix i): Academic Perspective on Traditional Architecture by Mr. Francis Shaw of Shaw & Jagger Architects (PDF)
- ii) Appendix ii.) Written Endorsement from Mr. Joseph Jutras of The Institute of Traditional Architecture (PDF)

1. Appendix 1: Sefton Climate Emergency Strategy Climate Emergency Strategy
2. Appendix 2: Sefton 2023/2024 Climate Report
modgov.sefton.gov.uk/documents/s124335/Climate+Emergency+Annual+Report+2023-2024+final.pdf
3. Francis Terry & Associates- The Secrets of Popular Architecture
<https://www.ftanda.co.uk/thoughts/secret-of-popular-architecture/>
4. Appendix 3: PAS Guide to better Sustainability Appraisal PAS Guide to better Sustainability Appraisal | Local Government Association
5. Appendix 4: Sefton Council Annual Air Quality Report 2024 air-quality-status-report-2024.pdf
6. Francis Terry & Associates- Natural Architecture Discussion
<https://www.ftanda.co.uk/thoughts/natural-architecture/>
7. Francis Terry & Associates- Sustainable Architecture Discussion (VIDEO)
<https://www.ftanda.co.uk/thoughts/what-is-sustainable-architecture/>
8. Francis Terry & Associates- Can Beautiful Homes be built in a Factory?
<https://www.ftanda.co.uk/thoughts/beautiful-homes/>
9. Create Streets- Design Codes Explanation design codes
10. Create Streets- Bootle Christ Church Project Bootle with Safe Regen
11. The King's Foundation- Officer's Mess Design Guide Rutland (PDF)
12. Create Streets- Lichfield Design Guide- Lichfield
13. Create Streets- Chatham Design Guide- Chatham
14. Create Streets- Street Assessment Service
Street Assessment - Create Streets
15. Create Communities Mapping Platform
Create Communities mapping platform - Create Streets
16. The King's Foundation- BIMBY Toolkit
Puts the power in your hands to influence new buildings in your area.
17. Francis Terry & Associates- Poundbury Discussion
<https://www.ftanda.co.uk/thoughts/poundbury/>
18. Institute of Traditional Architecture- Urban Planning
Urban Planning – Institute of Traditional Architecture
19. Heritage and the Economy | Historic England
20. The Economic Value of the Heritage Sector | Heritage Counts | Historic England;
21. Investing in Heritage to Avoid Embodied Carbon Emissions | Heritage Counts
22. Historic England;
23. The Embodied Carbon Emissions of Construction and Retrofit Materials for Traditional Buildings | Historic England
24. InYourArea- Community Campaigner David Barton- Placemaking Principles 2021
'Placemaking' is key to the future for Southport claims campaigner
25. InYourArea- Community Campaigner David Barton- Role of Traditional Town 2021
The role of the traditional town 'key' to Southport's future
26. Living with Beauty Report Example 76, Page. 177
Living with beauty: report of the Building Better, Building Beautiful Commission
27. InYourArea- Community Campaigner David Barton- Green Action Plan 2021
Former Councillor proposes climate change plan
28. InYourArea- Community Campaigner David Barton- Hedgerow Planting Benefits 2021
Campaigner calls for more green spaces in Southport
29. Benefits of Greenery Planting- The Guardian 2010
<https://www.theguardian.com/environment/green-living-blog/2010/oct/14/carbon-footprint-house>
30. Francis Terry & Associates- Glad to be Pastiche Discussion
<https://www.ftanda.co.uk/thoughts/glad-to-be-pastiche/>
31. Francis Terry & Associates- What is more important, Materials or Form?
<https://www.ftanda.co.uk/thoughts/rotonda-in-cheese/>
32. InYourArea- Community Campaigner David Barton- Lathom Hall Seaforth
<https://www.inyourarea.co.uk/news/restoration-of-seaforth-beatles-landmark-club-a-breakthrough-in-combatting-climate-crisis>

Design Codes, Designated & Non-Designated Heritage Assets, Conservation Areas, Climate Change, Historic Buildings, Traditional Vernacular Architecture:

SECTION 1: Design Codes:-

1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England

produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.

5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).

6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.

7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.

8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.

9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.

10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual and group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished

prized old buildings beloved by the community, such as community pubs, libraries and community centres.

11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.

12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.

SECTION 2: Designated & Non-Designated Heritage Assets:

1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.

2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.

3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as "Memory Lane" featured on InYourArea Magazine to enrich existing material archives.

4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.

5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.

6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.

7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived "good areas" where affluent people reside in historical style properties and less advantaged reside in contemporary ones.

8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.

9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.

10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area's founding or history locally.

11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.

12. Reconstruction Programme harnessing existing limited crafts people's skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.

13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain's Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.

14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through

the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.

SECTION 3: Conservation Areas:-

1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements.
9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.

SECTION 4: Climate Change:-

1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal divides regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.
4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.
5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.
6. Biodiversity- maximise greenery along all arterial roads and commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.
7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.

8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.

9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.

10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.

SECTION 5: Historic Buildings:-

1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.
2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.
3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.
4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.
5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.
6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.
7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through personal circumstances.
8. "Newer" style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.
9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.
10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.
11. Modern "Carbuncle" extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.
12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.

SECTION 6: Traditional Vernacular Architecture:-

1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.
2. These same people should be readily contactable for new construction
3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining "Breathing" Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don't have the time to do this themselves or may be risk averse even.
6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.

8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.

9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.

10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.

11. Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.

12. Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.

SECTION 7: Making an application:-

1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.
5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.
7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based.
8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
9. Proactive effort to stop Breaking and Entering style of "Urban Explorers" who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).

SECTION 8: MISCELLANEOUS:-

1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.
8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.
9. Provide a focused effort on utilising people's skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.
10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.
11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.
12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.

Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	The use of authentic Traditional Design Codes for new construction will bring multifold benefits for all key stakeholders. It is recommended that there be a ban on demolition of buildings constructed prior to 1950 to truly combat the Climate Crisis whilst bringing maximal advantages to the area through its greatest USP- Traditional Architecture which succeeds immensely on strong economic, ecological and environmental grounds.
FileAttachment - 8. If you have a filled-in representation form or other file that you wish to attach, you may add it here:	6548637
Comment ID	96
Response Date	16/12/2025 22:43:43
Consultee Family Name	Barton
Consultee Given Name	Community Campaigner David
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps Main Modifications Sustainability Appraisal / Habitats Regulations Assessment
Q4ref - MM Reference	Entirety
Q4page - Page	All
Q4chap - Chapter, Appendix Number or Map Inset	All
Q4policypara - Policy / Paragraph	All
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.</p> <p>This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.</p> <p>Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.</p> <p>It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.</p> <p>*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.</p> <p>Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.</p> <p>Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes. References to supporting documents are contained in the indented blue numbering.</p> <p>This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s)</p>

of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.

Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.

Community Campaigner David Barton:

Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.

Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.

Mr. Barton should like to credit and thank the leading professionals and organisations that continue to support his TVA endeavours including:

- 1) Mr. Francis Shaw- Shaw & Jagger Architects
- 2) The King's Foundation
- 3) Create Streets
- 4) Francis Terry & Associates
- 5) The Institute for Traditional Architecture

This Submission is supported by the following appendices:

- i) Appendix i): Academic Perspective on Traditional Architecture by Mr. Francis Shaw of Shaw & Jagger Architects (PDF)
- ii) Appendix ii.) Written Endorsement from Mr. Joseph Jutras of The Institute of Traditional Architecture (PDF)

1. Appendix 1: Sefton Climate Emergency Strategy Climate Emergency Strategy
2. Appendix 2: Sefton 2023/2024 Climate Report
modgov.sefton.gov.uk/documents/s124335/Climate+Emergency+Annual+Report+2023-2024+final.pdf
3. Francis Terry & Associates- The Secrets of Popular Architecture
<https://www.ftanda.co.uk/thoughts/secret-of-popular-architecture/>
4. Appendix 3: PAS Guide to better Sustainability Appraisal PAS Guide to better Sustainability Appraisal | Local Government Association
5. Appendix 4: Sefton Council Annual Air Quality Report 2024 air-quality-status-report-2024.pdf
6. Francis Terry & Associates- Natural Architecture Discussion
<https://www.ftanda.co.uk/thoughts/natural-architecture/>
7. Francis Terry & Associates- Sustainable Architecture Discussion (VIDEO)
<https://www.ftanda.co.uk/thoughts/what-is-sustainable-architecture/>
8. Francis Terry & Associates- Can Beautiful Homes be built in a Factory?
<https://www.ftanda.co.uk/thoughts/beautiful-homes/>
9. Create Streets- Design Codes Explanation design codes
10. Create Streets- Bootle Christ Church Project Bootle with Safe Regen
11. The King's Foundation- Officer's Mess Design Guide Rutland (PDF)
12. Create Streets- Lichfield Design Guide- Lichfield
13. Create Streets- Chatham Design Guide- Chatham
14. Create Streets- Street Assessment Service
Street Assessment - Create Streets
15. Create Communities Mapping Platform
Create Communities mapping platform - Create Streets
16. The King's Foundation- BIMBY Toolkit
Puts the power in your hands to influence new buildings in your area.
17. Francis Terry & Associates- Poundbury Discussion
<https://www.ftanda.co.uk/thoughts/poundbury/>
18. Institute of Traditional Architecture- Urban Planning
Urban Planning – Institute of Traditional Architecture
19. Heritage and the Economy | Historic England
20. The Economic Value of the Heritage Sector | Heritage Counts | Historic England;
21. Investing in Heritage to Avoid Embodied Carbon Emissions | Heritage Counts
22. Historic England;
23. The Embodied Carbon Emissions of Construction and Retrofit Materials for Traditional Buildings | Historic England
24. InYourArea- Community Campaigner David Barton- Placemaking Principles 2021
'Placemaking' is key to the future for Southport claims campaigner
25. InYourArea- Community Campaigner David Barton- Role of Traditional Town 2021
The role of the traditional town 'key' to Southport's future
26. Living with Beauty Report Example 76, Page. 177
Living with beauty: report of the Building Better, Building Beautiful Commission
27. InYourArea- Community Campaigner David Barton- Green Action Plan 2021
Former Councillor proposes climate change plan
28. InYourArea- Community Campaigner David Barton- Hedgerow Planting Benefits 2021
Campaigner calls for more green spaces in Southport
29. Benefits of Greenery Planting- The Guardian 2010

<https://www.theguardian.com/environment/green-living-blog/2010/oct/14/carbon-footprint-house>

30. Francis Terry & Associates- Glad to be Pastiche Discussion
<https://www.ftanda.co.uk/thoughts/glad-to-be-pastiche/>

31. Francis Terry & Associates- What is more important, Materials or Form?
<https://www.ftanda.co.uk/thoughts/rotonda-in-cheese/>

32. InYourArea- Community Campaigner David Barton- Lathom Hall Seaforth
<https://www.inyourarea.co.uk/news/restoration-of-seaforth-beatles-landmark-club-a-breakthrough-in-combatting-climate-crisis>

Design Codes, Designated & Non-Designated Heritage Assets, Conservation Areas, Climate Change, Historic Buildings, Traditional Vernacular Architecture:

SECTION 1: Design Codes:-

1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.
5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).
6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.
7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.
8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.
9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.
10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual and group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.
11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.
12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.

SECTION 2: Designated & Non-Designated Heritage Assets:

1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.
2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.
3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as "Memory Lane" featured on InYourArea Magazine to enrich existing material archives.
4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.
5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.
6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.
7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived "good areas" where affluent people reside in historical style properties and less advantaged reside in contemporary ones.
8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.

9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.
10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area's founding or history locally.
11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.
12. Reconstruction Programme harnessing existing limited crafts people's skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.
13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain's Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.
14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.

SECTION 3: Conservation Areas:-

1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements.
9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.

SECTION 4: Climate Change:-

1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials

as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.

4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.

5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.

6. Biodiversity- maximise greenery along all arterial roads and commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.

7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.

8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.

9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.

10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.

SECTION 5: Historic Buildings:-

1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.

2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.

3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.

4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.

5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.

6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.

7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through personal circumstances.

8. "Newer" style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.

9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.

10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.

11. Modern "Carbuncle" extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.

12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.

SECTION 6: Traditional Vernacular Architecture:-

1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.

2. These same people should be readily contactable for new construction
 3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining "Breathing" Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
 4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
 5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don't have the time to do this themselves or may be risk averse even.
 6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
 7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.
 8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.
 9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.
 10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.
 11. Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.
 12. Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.
- SECTION 7: Making an application:-
1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
 2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
 3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
 4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.
 5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
 6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.
 7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based.
 8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
 9. Proactive effort to stop Breaking and Entering style of "Urban Explorers" who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
 10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).
- SECTION 8: MISCELLANEOUS:-
1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
 2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
 3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
 4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
 5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
 6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
 7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.

	<p>8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.</p> <p>9. Provide a focused effort on utilising people's skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.</p> <p>10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.</p> <p>11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.</p> <p>12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.</p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>The document is absent of any direct focus on the need for authentic Traditional Architecture Design Codes, especially for new construction. There are multifold reasons for supporting this on strong economic, ecological and environmental grounds besides breaking down societal divides. A ban on demolition of buildings constructed prior to 1950 should be put in place alongside the fullest protections and incentives for conserving Non-designated Heritage Assets and Unclassified heritage buildings, particularly lone-standing detached ones.</p> <p>Please see my PDF Umbrella Representation for my entire submission and reasoning which is supported by leading academics and architects.</p>
<p>FileAttachment - 8. If you have a filled-in representation form or other file that you wish to attach, you may add it here:</p>	<p>remove-6549311</p>

Comment ID	111
Response Date	17/12/2025 10:36:55
Consultee Family Name	Brown
Consultee Given Name	Jacqueline
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM90 SP11(3)
Q4page - Page	61 of Schedule of Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy SP11 (3) Lyme Park
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	As a general point I am concerned about the boundaries of proposed development sites and how these boundaries will be demarcated going forward. One suggestion is to have the sites fenced off. In relation to SP11(3) I am concerned about the decision to take out a `ribbon` of land which formerly separated the area into 2 smaller sites. My concerns are around the impact on the `wildlife corridor` this provided.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Go back to the original plan and have 2 smaller sites without the joining ribbon of land.

Comment ID	88
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM1
Q4page - Page	2 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 4 Strategic Objectives for the Borough
Q4policypara - Policy / Paragraph	Strategic Objectives for the Borough
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MM POINTS SERIATIM</p> <p>This head covers individual MMs, as they relate to the TK sites. In the interest of brevity, given the need for detail in the foregoing, the following is a selection of points, to be viewed as exemplars, and is not exclusive nor preventative of any further such points being raised in any future submissions or hearing of whatever nature or in whatever forum.</p> <p>MM1 modifies the Boroughs strategic objectives (SOs), by amending SOs 9 and 12, and adding new SOs 14,15 and 16. The tightening of the SOs hereby means that, whereas previously the proposed TK developments would have been contrary to and inimical with the Boroughs own precepts and objectives, this is now a fortiori the case. For the relevant provision to expect the Borough to act in such manner is certainly not in accordance with legal requirements; and since it is not viable for the Borough to deliberately proceed with proposals for developments that is, on the face of it, not legally compliant, the developments as proposed cannot be effected rendering the proposals unsound.</p> <p>That is to say, either the MM is unsound and not in accordance with legal requirements (which we do not view to be the case); or the current proposals for the TK developments, which would be contrary to these (and other) SOs, especially as modified, are.</p>
Comment ID	86
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q4ref - MM Reference	MM73
Q4page - Page	52 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	CT1
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>INTRODUCTORY COMMENTS</p> <p>1. This representation is obviously made with regard to the Talke sites (TK 6,10,17 and 27 (the Talke sites")). Therefore, although only a small section of the MMs refers to the Talke sites specifically (MMs 100-104 incl.), where this representation refers below to general (ie non-site-specific) MMs, these are made referable to the Talke sites.</p> <p>2. Neither TAG nor the Talke community are N.I.M.B.Y.s, and are not and never have been requesting no development in the area. Reduced figures for the TK sites, whether removal of one or more of the sites with greater inherent and consequential and/or knock-on infra-structure problems, or reduction of the numbers as a whole, as presented previously, would suffice. This is not to rehash previous representations, but to indicate that this position informs the comments below.</p> <p>3. The MMs raise extremely insightful and relevant matters, in many instances tightening the criteria for development. Indeed, in these many instances the tightened criteria mean that, where the Local Plan's provision for development on the TK sites were claimed to be, and/or appeared to be, unlawful and/or unsound in previous representations, they are more so now. In other words, whether the relevant Local Plan provision referred to by any specific MM was or might have been unlawful and/or unsound prior to</p>

the MM or not, where the MM tightens the criteria, how much more ("a fortiori") are the relevant Local Plan provisions rendered so by the MM concerned.

4. Where issues of soundness of legal/procedural compliance are raised below, the reasons for this, including relevant heads, are indicated in each case.

MM73 and Site CT1

Lastly under this head, it is noted that site CT1, closely contiguous to Talke Village and previously proposed for development, has been removed from the local plan. MM73 allows for this. It is further noted that the reasons for the deletion of the said site are, inter alia, "opening up" costs associated with its greenfield location, flooding, and "remediation costs associated with its former use", namely mining.

Leaving aside for now the issue of developers' costs, and turning first to the matters of flooding and mining, it needs to be strongly pointed out that the TK sites are affected equally strongly by both.

Not only are the TK sites affected by "former use" of mining, in some cases this is worse than CT1 -for example, TK10 was the head of the Talke o' th' Hill colliery (and hence the name of the lower part of the Village -Talke Pits.) If all sites are to be treated fairly, equally and non-prejudicially this should cause the TK sites to be considered in the same light as CT1.

With regard to flooding, both Coalpit Hill (especially at the lower end where there is a pit-pony burial site) and the St Martin's Road/High Street area flood regularly in rains. The latter is not surprising since there are three natural springheads here, and previous costly drainage work has already failed to deal with the problem which, as stated, continually recurs. This flooding problem cannot but be exacerbated if the TK sites are concreted over with the full number of dwellings proposed.

This observation is not merely to repeat submissions previously made by both TAG as well as other consultees, but arises out of MM73 and the removal of CT1 from the local plan, without similar consideration being applied to, and consequent similar steps being taken with regard to, some or all of the TK sites in part or as a whole.

The manner in which the TK sites, even though closely contiguous to CT1 and similar in the above and other respects thereto, have been treated apparently discriminatorily disadvantageously, seems to be a pattern. The inspector has been made aware that, although Newcastle-under-Lyme Site Strategic Report 2022 deemed sites TK10,17 and 27 all "unsuitable" for development and indeed "development high risk area". This was inexplicably reversed by the First Draft of the Local Plan, and not only was no reason for this openly given but, as the inspector has further been made aware, the portfolio-holding councillor refused multiple times at the relevant council meeting to answer a question in this regard.

This is further exacerbated by the issue of developers' costs, and therefore their profit, seeming to be a primary consideration. This arises out of the use of the aforementioned phrases "opening up costs" and "remediation-costs". it would be a shame, not to mention unsound and/or not in accordance with legal procedures, if developers' costs (and therefore profit) were to take precedence over soundness and what is appropriate or not. Whilst TAG recognises the practicalities of commercial life, is the ultimate content of the Local Plan to be dictated by what one developer or another deems to be a reasonable cost or an insufficient profit?

This pattern, of consistently treating the TK sites more adversely than exactly similar sites such as CT1, is brought into sharp focus by the removal of site CT1 for reasons exactly applicable to the TK sites -and yet without the TK sites being treated in the same way, again without explanation -and by the consequently necessary MM73.

So serious is the failure of this pattern, culminating in the unsound MM73, to comply with legal requirements, that it appears that it would in and of itself be sufficient cause to enable an application for judicial review hereof.

However, TAG and the local community are, as above, not nimbys. We therefore simply request that the same consideration of the same factors, with full explanation, be given to the TK sites as was apparently given to CT1 ; and for some or all of the TK sites to be removal from the local plan, or for the numbers of dwelling proposed for some or all of the TK sites, to be reduced, as was the case with CT1 with the same factors in play. This would lead to a "TK" MM, similar to MM73, being promulgated, and thereby render MM73 not part of a discriminatory pattern, and accordingly, both legally and procedurally compliant, as well as sound.

CONCLUSION

TAG thanks the inspector for her time and attention in reading this, and hope that she has found it to be reasonable and reasoned in suggesting reasons either why relevant MMs are unsound/not legally compliant or why the relevant MMs themselves render the associated Local Plan provisions unsound/not legally and/or procedurally compliant; and in either case with regard to the TK sites.

Comment ID	85
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications

Q4ref - MM Reference	MM39
Q4page - Page	27 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 10 Infrastructure and Transport
Q4policypara - Policy / Paragraph	IN7 Utilities
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>INTRODUCTORY COMMENTS</p> <p>1. This representation is obviously made with regard to the Talke sites (TK 6, 10, 17 and 27 (the Talke sites")). Therefore, although only a small section of the MMs refers to the Talke sites specifically (MMs 100-104 incl.), where this representation refers below to general (ie non-site-specific) MMs, these are made referable to the Talke sites.</p> <p>2. Neither TAG nor the Talke community are N.I.M.B.Y.s, and are not and never have been requesting no development in the area. Reduced figures for the TK sites, whether removal of one or more of the sites with greater inherent and consequential and/or knock-on infra-structure problems, or reduction of the numbers as a whole, as presented previously, would suffice. This is not to rehash previous representations, but to indicate that this position informs the comments below.</p> <p>3. The MMs raise extremely insightful and relevant matters, in many instances tightening the criteria for development. Indeed, in these many instances the tightened criteria mean that, where the Local Plan's provision for development on the TK sites were claimed to be, and/or appeared to be, unlawful and/or unsound in previous representations, they are more so now. In other words, whether the relevant Local Plan provision referred to by any specific MM was or might have been unlawful and/or unsound prior to the MM or not, where the MM tightens the criteria, how much more ("a fortiori") are the relevant Local Plan provisions rendered so by the MM concerned.</p> <p>4. Where issues of soundness of legal/procedural compliance are raised below, the reasons for this, including relevant heads, are indicated in each case.</p> <p><u>MM39</u></p> <p>There is over-arching consternation regarding MM39 (Policy IN7) and its amendment by deletion of criterion 1 thereof. Surface water disposal, water supply and wastewater treatment ("water services") might well be the purview of separate regulatory authorities, but so too are other matters herein, such as Utilities or, indeed, Highways, as above, yet these are not deleted.</p> <p>These water services are similarly critical to the viability of the proposed TK site developments, not least because of the parlous state of relevant local water treatment plants, most notably the already woefully inadequate Red Bull/Kidsgrove Water Treatment facility. To seek to pass the buck of water services away from the local plan and its ambit, when it is such a critical part of the consideration of the viability of the developments, would render this MM, and therefore that part of the local plan relating to development of the TK sites, unsound (not positively prepared because not meeting the area's needs; not justified because appropriate strategy has been removed by said MM; and not effective, as the developments are rendered not viable because of inadequate consideration of provision of these necessary water services); and also not compliant with legal requirements, by apparently arbitrary removal of one necessary aspect of examination of the Local plan for a reason which could have been applied to many such aspects, but which has not been.</p> <p>Further, there is an inherent contradiction within the MM Schedule in this regard in that, when dealing with flood risk and drainage systems etc, at MMs 44-49 these MMs specifically stipulate surface water as well as flood plain management. It is difficult to see why surface water issues are relegated to "be dealt with through other regulatory matters" for purposes of MM39 but not for purposes of other MMs. This reinforces the comments made above regarding the arbitrary deletion within said criterion 1 of MM39; and raises further questions as to the reasons for proposed deletion in the first place.</p> <p>Additionally, the deletion in this MM appears to fly in the face of submissions already made by relevant Water Authorities, indicating that the current provision of these water services would be inadequate for the proposed developments, and would accordingly be opposed by them. This would further render the developments unviable as above, and therefore the MM and local plan provisions relating thereto, unsound.</p> <p>Finally, and especially in light of the paragraphs above, it does not appear that removing water services from the ambit of the local plan for any reason, let alone for the aforementioned spurious reason, could in anyway be considered to be best practice. This further renders MM39 -by proposing the relevant modification/deletion which is patently not best practice -not prepared in accordance with either legal or procedural requirements; and not sound under the three heads mentioned above.</p> <p>Accordingly, taking all of the above into account, it would seem the better course for not only the proposed deletion to be re-instated, but also for MM 39 to have inserted a provision like that at MM104, requiring an assessment of the ability of current provision of water services for these sites to meet "the area's objectively assessed needs".</p> <p>CONCLUSION</p> <p>TAG thanks the inspector for her time and attention in reading this, and hope that she has found it to be reasonable and reasoned in suggesting reasons either why relevant MMs are unsound/not legally compliant or why the relevant MMs themselves render the associated Local Plan provisions unsound/not legally and/or procedurally compliant; and in either case with regard to the TK sites.</p>

Comment ID	73
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM104
Q4page - Page	68 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	TK27
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>INTRODUCTORY COMMENTS</p> <p>1. This representation is obviously made with regard to the Talke sites (TK 6,10,17 and 27 (the Talke sites")). Therefore, although only a small section of the MMs refers to the Talke sites specifically (MMs 100-104 incl.), where this representation refers below to general (ie non-site-specific) MMs, these are made referable to the Talke sites.</p> <p>2. Neither TAG nor the Talke community are N.I.M.B.Y.s, and are not and never have been requesting no development in the area. Reduced figures for the TK sites, whether removal of one or more of the sites with greater inherent and consequential and/or knock-on infra-structure problems, or reduction of the numbers as a whole, as presented previously, would suffice. This is not to rehash previous representations, but to indicate that this position informs the comments below.</p> <p>3. The MMs raise extremely insightful and relevant matters, in many instances tightening the criteria for development. Indeed, in these many instances the tightened criteria mean that, where the Local Plan's provision for development on the TK sites were claimed to be, and/or appeared to be, unlawful and/or unsound in previous representations, they are more so now. In other words, whether the relevant Local Plan provision referred to by any specific MM was or might have been unlawful and/or unsound prior to the MM or not, where the MM tightens the criteria, how much more ("a fortiori") are the relevant Local Plan provisions rendered so by the MM concerned.</p> <p>4. Where issues of soundness of legal/procedural compliance are raised below, the reasons for this, including relevant heads, are indicated in each case.</p> <p>MM104</p> <p>The most critical of these points relates to MM104 (Policy TK27), and the amendment of criterion 8 thereof. Whilst the assessment referred to in MM104 is vital and welcomed, it does not go far enough. There should be specifically added to the two matters to be included in the said off-site highway improvement assessment (the assessment"), the ability of the infrastructure of the main road through Talke and Talke Pits (Swan Bank, Crown Bank and High Street ("the main road")), as well as of Pit Lane, to absorb the hundreds of additional traffic units from TK27, beyond merely the junction ("the junction") currently referred to in MM104.</p> <p>This is not merely a matter for a later planning stage or to be assumed to be included in an assessment. Nor does the difficulty of the road infrastructure being able to absorb the additional traffic admit by resolution by s106. Therefore the addition of this matter as an express item to be added to the inclusions in the assessment seem to be as important as, if not more so than, the two items which are specifically mentioned.</p> <p>This is even more starkly the case when it is noted that, disturbingly, the wording of criterion 8 of MM104 is taken verbatim from the local plan consultation submission of The Strategic Land Group, the developer with an expressed interest in developing TK27. It cannot be appropriate that critical modifications to the draft Local Plan be limited to those suggested/requested by developers themselves. Therefore, recognising that the problem with developing TK27 needs addressing so that a modification is necessary and cannot therefore be excluded, but limiting the modification to that suggested by the developer, renders the proposals associated with it (in this case policy TK27), unsound and not legally compliant.</p> <p>Accordingly, failure to specifically include this in a modification relating to the critical issue of highway infrastructure through Talke Village, would render the provision in both the Schedule of Proposed MMs and the Local Plan unsound because –</p> <p>a) If this issue is not included in the MM dealing with Highway infra-structure, or therefore in the local Plan, neither can be said to be based on a strategy which seeks to meet an objectively assessed requirement (how can it, if it has not been included in the terms of such an assessment?) and both are therefore not positively prepared.</p>

	<p>b) Unless the infrastructure of the main road supports the additional traffic generated by the proposed development, to be positively established by an independent assessment, the proposed development would not be deliverable or effective.</p> <p>c) Unless an assessment establishes that the highway infrastructure through the Village, and therefore the Village itself, would not be compromised, the proposed development is not justified.</p> <p>Similarly, if an assessment of off-site highway needs which the Inspector herself has perceived to be necessary, is not seen to be thoroughgoing, but is perceived to be allowing of shortcomings on the face of it, this would seem to render such provision not compliant with legal procedures, to the point of admitting of judicial review.</p> <p>We therefore respectfully submit that the above addition be made to the Inspector's relevant and important MM104.</p> <p><u>CONCLUSION</u></p> <p>TAG thanks the inspector for her time and attention in reading this, and hope that she has found it to be reasonable and reasoned in suggesting reasons either why relevant MMs are unsound/not legally compliant or why the relevant MMs themselves render the associated Local Plan provisions unsound/not legally and/or procedurally compliant; and in either case with regard to the TK sites.</p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>There should be specifically added to the two matters to be included in the said off-site highway improvement assessment (the assessment"), the ability of the infrastructure of the main road through Talke and Talke Pits (Swan Bank, Crown Bank and High Street ("the main road")), as well as of Pit Lane, to absorb the hundreds of additional traffic units from TK27, beyond merely the junction ("the junction") currently referred to in MM104.</p>
Comment ID	84
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM101
Q4page - Page	67 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	TK10
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
<p>Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.</p>	<p><u>INTRODUCTORY COMMENTS</u></p> <p>1. This representation is obviously made with regard to the Talke sites (TK 6,10,17 and 27 (the Talke sites")). Therefore, although only a small section of the MMs refers to the Talke sites specifically (MMs 100-104 incl.), where this representation refers below to general (ie non-site-specific) MMs, these are made referable to the Talke sites.</p> <p>2. Neither TAG nor the Talke community are N.I.M.B.Y.s, and are not and never have been requesting no development in the area. Reduced figures for the TK sites, whether removal of one or more of the sites with greater inherent and consequential and/or knock-on infra-structure problems, or reduction of the numbers as a whole, as presented previously, would suffice. This is not to rehash previous representations, but to indicate that this position informs the comments below.</p> <p>3. The MMs raise extremely insightful and relevant matters, in many instances tightening the criteria for development. Indeed, in these many instances the tightened criteria mean that, where the Local Plan's provision for development on the TK sites were claimed to be, and/or appeared to be, unlawful and/or unsound in previous representations, they are more so now. In other words, whether the relevant Local Plan provision referred to by any specific MM was or might have been unlawful and/or unsound prior to</p>

	<p>the MM or not, where the MM tightens the criteria, how much more ("a fortiori") are the relevant Local Plan provisions rendered so by the MM concerned.</p> <p>4. Where issues of soundness of legal/procedural compliance are raised below, the reasons for this, including relevant heads, are indicated in each case.</p> <p><u>MM101</u></p> <p>A similar modification as in MM104 as amended, should be inserted at MM101 to ensure soundness and legal compliance</p> <p><u>CONCLUSION</u></p> <p>TAG thanks the inspector for her time and attention in reading this, and hope that she has found it to be reasonable and reasoned in suggesting reasons either why relevant MMs are unsound/not legally compliant or why the relevant MMs themselves render the associated Local Plan provisions unsound/not legally and/or procedurally compliant; and in either case with regard to the TK sites.</p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>There should be specifically added to the two matters to be included in the said off-site highway improvement assessment (the assessment"), the ability of the infrastructure of the main road through Talke and Talke Pits (Swan Bank, Crown Bank and High Street ("the main road")), as well as of Pit Lane, to absorb the hundreds of additional traffic units from TK10.</p>
Comment ID	90
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM4
Q4page - Page	5 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD3 Distribution of Development
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p><u>MM POINTS SERIATIM</u></p> <p>This head covers individual MMs, as they relate to the TK sites. In the interest of brevity, given the need for detail in the foregoing, the following is a selection of points, to be viewed as exemplars, and is not exclusive nor preventative of any further such points being raised in any future submissions or hearing of whatever nature or in whatever forum.</p> <p>MM4 (Update of Table 2) -the updated figures again reinforce that the TK proposals in their current form are not necessary and, a fortiori, render them unsound.</p>
Comment ID	94
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM61

Q4page - Page	43 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4polycypara - Policy / Paragraph	SE14 Green and Blue Infrastructure
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p><u>MM POINTS SERIATIM</u></p> <p>This head covers individual MMs, as they relate to the TK sites. In the interest of brevity, given the need for detail in the foregoing, the following is a selection of points, to be viewed as exemplars, and is not exclusive nor preventative of any further such points being raised in any future submissions or hearing of whatever nature or in whatever forum.</p> <p>MM61(Amendment of criterion 2 by deletion of 2d) -no reason is given for the removal of this provision which, given the diminution of the "Green..Infrastructure" (policy SE14) which would be wrought by the TK developments, would be important if same were to go ahead. Said removal accordingly appears arbitrary, unnecessary, prejudicial and unsound.</p>
Comment ID	91
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM7
Q4page - Page	7 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4polycypara - Policy / Paragraph	Policy PSD4 Development Boundaries and the Open Countryside
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p><u>MM POINTS SERIATIM</u></p> <p>This head covers individual MMs, as they relate to the TK sites. In the interest of brevity, given the need for detail in the foregoing, the following is a selection of points, to be viewed as exemplars, and is not exclusive nor preventative of any further such points being raised in any future submissions or hearing of whatever nature or in whatever forum.</p> <p>MM7 (Amendment to criterion4), via the a fortiori principle, renders the TK proposals in their current form, contrary to the MM7 and therefore unsound.</p>
Comment ID	92
Response Date	16/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM32
Q4page - Page	23 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 10 Infrastructure and Transport
Q4polycypara - Policy / Paragraph	IN2 Transport and Accessibility
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please	<p><u>MM POINTS SERIATIM</u></p> <p>This head covers individual MMs, as they relate to the TK sites. In the interest of brevity, given the need for detail in the foregoing, the following is a selection of points, to be viewed as exemplars, and is not exclusive nor preventative of any further such points being raised in any future submissions or hearing of whatever nature or in whatever forum.</p>

also use this box to set out your comments.	MM32 (Amendments to criterion 1), via the a fortiori principle (and especially with regard to "residual impacts on the road networks" in the locality), renders the TK proposals in their current form contrary to same and therefore unsound.
Comment ID	89
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM3
Q4page - Page	4 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	Policy PSD1 Overall Development Strategy
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p><u>MM POINTS SERIATIM</u></p> <p>This head covers individual MMs, as they relate to the TK sites. In the interest of brevity, given the need for detail in the foregoing, the following is a selection of points, to be viewed as exemplars, and is not exclusive nor preventative of any further such points being raised in any future submissions or hearing of whatever nature or in whatever forum.</p> <p>MM3-the problems of highway and other major infrastructure in Talke and Talke Pits is well documented above and elsewhere. This modification requires that these be addressed in any proposals. As set out above, they are currently not being so addressed in any adequate manner. This modification cements and strengthens the requirement for there to be either adequate existing infrastructure or for proposals to be made for the adequate improvement of same. Neither currently exist. This MM therefore renders the current proposals for the TK developments unsound and not in accordance with legal and procedural requirements.</p>
Comment ID	93
Response Date	15/12/2025 13:53:00
Consultee Company / Organisation	Talke Action Group
Consultee Position	Chairman
Consultee Family Name	Burgess
Consultee Given Name	K
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM41
Q4page - Page	28 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4policypara - Policy / Paragraph	SE1 Pollution and Air Quality
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p><u>MM POINTS SERIATIM</u></p> <p>This head covers individual MMs, as they relate to the TK sites. In the interest of brevity, given the need for detail in the foregoing, the following is a selection of points, to be viewed as exemplars, and is not exclusive nor preventative of any further such points being raised in any future submissions or hearing of whatever nature or in whatever forum.</p> <p>MM41 (Amendments to criterion 1) - TAG and the local community are delighted to note that this MM adds provision that, inter alia, where air pollution from emission "mitigation measures cannot acceptably mitigate the impact of development then planning permission should be refused".</p> <p>This is pertinent especially to the junction where, regardless of how traffic flow is controlled at the junction, there will be build-up of traffic back along all the roads concerned. The already existing traffic congestion along the main road (as defined above) through the Village is well documented, with gridlock often occurring at rush-hour or when there are problems on nearby major arterial routes (M6, A500, A34) at any time of day. Notwithstanding this, build back of traffic upwards Crown and Swan Banks to the junction is currently released when traffic reaches the junction.</p> <p>However, with the addition of hundreds more vehicles and, critically, either a roundabout or traffic lights or similar at the junction itself, the build back will not be able to ease quickly, and there will be stationary</p>

	<p>vehicles potentially all the way back along the main road to the traffic entry point at the bottom of Talke Pits. Thus, far from resolving a problem, any traffic control measures at the junction will create a worse one than currently exists and, without infrastructure consideration of the traffic effects along the main road, will create emission and air pollution problems from queues of stationary, gridlocked vehicles.</p> <p>As with the infrastructure matters set out, this issue of air pollution seems too important to leave to the planning stage, where the focus is more on the development and less on the knock-on consequences in the wider community - in this case, more on getting the vehicles out of the TK developments and less on what happens thereafter.</p> <p>Therefore, this MM (taking also into account the related comments pertaining to MM104) should make this issue of emissions and air pollution subject to the same impact assessment for the whole of the said main road as suggested for the infrastructure: with further provision for modification of the TK proposals if the infrastructure wider than the development itself is not, and cannot be made to be, adequate to deal with the consequences, including emissions and pollution, of the development.</p> <p>Accordingly, whereas it is this MM41 which itself makes the point of the importance of air pollution mitigation measures, the consequences of the failure of such mitigation measures acceptably to mitigate the impact of the developments is too important to kick down the road. Recognising the problem, but choosing to ignore it at this stage, would render this MM, and the TK proposals, unsound and not legally and/or procedurally compliant.</p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>This MM (taking also into account the related comments pertaining to MM104) should make this issue of emissions and air pollution subject to the same impact assessment for the whole of the said main road as suggested for the infrastructure</p>

Comment ID	128
Response Date	17/12/2025 11:51:00
Consultee Family Name	Casey-Hulme
Consultee Given Name	Cllr Sheelagh
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 'land at J16 of the M6'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I have been contacted by a resident who has raised concerns regarding the proposed AB2 employment site allocation for warehouse development. These concerns relate primarily to the site's location, scale and compatibility with the spatial strategy set out in the Newcastle-under-Lyme Local Plan.</p> <p>The AB2 site is located at a significant distance from the main residential areas of the borough, which conflicts with Local Plan objectives to focus development in accessible locations that reduce the need to travel and support sustainable modes of transport. The proposal risks increasing reliance on private car use and heavy goods vehicle movements, contrary to policies aimed at minimising transport impacts and promoting sustainable development.</p> <p>I am inclined to agree that the scale of development proposed at AB2 appears disproportionate to the identified employment needs of the Borough of Newcastle-under-Lyme, particularly given the availability of existing and more sustainable employment sites within the borough and wider sub-region. The Local Plan emphasises making effective use of previously developed land and established employment areas before allocating new, less accessible sites.</p> <p>In addition, the cumulative impact on the local and strategic highway network would be significant. Increased traffic volumes associated with large-scale warehousing would place additional pressure on existing infrastructure, potentially requiring costly mitigation measures and undermining Local Plan policies that seek to manage growth in a way that is safe, efficient and environmentally responsible.</p> <p>For these reasons, it is considered that the proposed AB2 allocation does not fully align with the Local Plan's spatial strategy, sustainability objectives, or approach to meeting employment needs in a proportionate and plan-led manner.</p>

Comment ID	191
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM11
Q4page - Page	11 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 6 Climate and Renewable Energy
Q4policypara - Policy / Paragraph	CRE1 Climate Change
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	MM11 Policy CRE1 (Climate change) criteria 6h - The suggested text requires further addition for clarity and understanding by referencing access to services and facilities.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	h. Development should be located to minimise the need for travel through easy access to services and facilities and designed to promote walking, cycling and public transport to minimise carbon emissions from vehicular traffic
Comment ID	188
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM09
Q4page - Page	9 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD6 Supporting Information 5.41a
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise	<p>From a public health perspective, we support the proposed change in wording to Paragraph 5.41a and the change to Policy RET3</p> <p>The change allows for planning permission not to be granted where there would be an adverse impact on health and wellbeing. In Newcastle-under-Lyme, the prevalence of overweight (including obesity) for</p>

as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>reception aged children is 25.4%, and for year 6 children it is 41.0% (using the last three years of data combined). The percentage of children moving from a healthy weight in reception to overweight (including obesity) in year 6 is 23.1% .</p> <p>We support the restriction of Hot Food Takeaways (HFTs) and Fast Food Outlets (FFOs) within walking distance of schools. 400m is considered to equate to a 5-minute walking distance and a reasonable distance considered for people to walk, for example, to a bus stop. However, according to evidence cited by the Town and Country Planning Association, 800m is generally considered a 'standard walkable distance.' Stopping new outlets from opening within 800m would help to reduce the appeal and accessibility during lunchtimes, for older pupils, and after school, including for primary school pupils, as there is a possibility that parents and carers may purchase food from these outlets on the way home, or at a later stage. An impact study on takeaways near secondary schools in Brighton and Hove found that a 400m boundary would not sufficiently cover the areas used by pupils and that an 800m radius was more relevant . Local evidence set out in Wyre Forest's District Local Plan highlights that exposure to at least one FFO within 1 mile of home and within 1 mile of school were both associated with a higher proportion of children becoming obese.</p> <p><i>Officer note: See attached for details of weblinks and data sources</i></p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Whilst we support the provisions in the Plan around Hot food takeaways, as noted above, we believe the Plan would be more effective if the 400m restriction was increased to 800m.</p>
Attachments	1307641__Staffs CC_MM09_MM27.docx
Comment ID	192
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM32
Q4page - Page	23 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 10 Infrastructure and Transport
Q4polycypara - Policy / Paragraph	IN2 Transport and Accessibility
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We welcome the simplification of the wording for clarity. However, sustainable modes now appear to only be required to protect the operation of the highways network. We have lost the wider context and need to ensure accessibility.</p> <p>Criteria 8 needs to remove reference to Borough Integrated Transport Strategy as this no longer exists.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say	<p>Suggested change to policy wording:</p> <p>1) New development should make appropriate provision for access by sustainable modes of transport to protect the integrity of the highway network, to ensure accessibility and provide transport choice. and the Council will work with developers to ensure that development proposals which contribute towards an accessible, efficient and safe transport network that offers a range of transport choices and improves accessibility through sustainable modes of travel will be supported. All developments should meet, where relevant, the following criteria</p> <p>To amend criteria 8, as follows:</p>

why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	- In order to respond to local transport needs, Development should take account of the Local Transport Plan and associated documents including the Borough Integrated Transport Strategy, Bus Service Improvement Plan and Local Cycling and Walking Infrastructure Plan.
Comment ID	196
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM78
Q4page - Page	56 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	KL13/KL15
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The changes to Policies KL13 and TB19 Plan in relation to the route connecting the A525 to Whitmore Road are understood and accepted. However, the changes proposed in MM78 to criteria 5 and paragraph 13.89 in relation to financial contributions to the proposed route are unclear due to the way the route has been defined and labelled on the Policies Map. The safeguarded route effectively consists of 3 sections, which is shown on the Interactive Policies Map. However, it is noted that the static map (PM03) only shows the section in TB19 and the section between TB19 and KL13, the stretch through KL13 to the A525 is missing.</p> <p>The Policy wording relating to developer contributions in MM78 states '<i>Developer contributions will be required towards the provision of a transport link between the A525 and A53 shown as a safeguarded link on the Policies Map.</i>' From this it is unclear what elements of the 'Safeguarded Route' are to be subject to developer contributions, it could be construed as being the whole length from Keele Rd to Whitmore Rd, which is not the intention. Developer contributions are only sought to the section of the 'safeguarded route' between the two allocations KL13 and TB19, as indicated by the red and black dashed line show on the Policies Map at PM03. However, the proposed policy wording is not clear in this respect.</p> <p>NOTE</p> <p>The provision in SP11 criteria 16 have not been updated to match the changes in MM78 in relation to contributions to the safeguarded route.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Changes are required to the Policy wording and Policies map to make it clear which sections of the safeguarded route are to be the subject of developer contributions and those that are to be provided directly by KL13 and TB19.</p> <p>The static Policies Map also needs to ensure inclusion of the section within KL13 is included.</p>
Comment ID	200
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM106
Q4page - Page	68 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations

Q4policypara - Policy / Paragraph	TB19
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	At the hearing sessions it was presented that the Policy provision for Site TB19 was missing reference to provision of a bus service, which is necessary to provide sustainable travel choices for the future residents of the estate. MM106 updating the Policy TB19 has not included such provision in its suggested raft of changes and as such the Policy is not acceptable in transport terms. An additional criteria is necessary requiring the provision of a bus service between the site and Newcastle Town Centre calling at other residential areas and destinations along the way to maximise the chance of the service becoming commercial.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Policy TB19 to be amended by the addition of the following criteria to the 13 already listed:</p> <p>- Provision of a new and / or enhanced bus service from Newcastle-under-Lyme to the site, including bus stops and associated infrastructure.</p> <p>Paragraph 13.240 should also be updated with the addition of the following sentence at the end of the existing paragraph.</p> <p>'A new bus service will be provided from Newcastle-under-Lyme to the site, which will also provide the opportunity to call at other residential areas and destinations.'</p>
Comment ID	195
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MM67 proposes to amend criteria 13 to include provisions for discouraging the routing of traffic past the Black Firs and Cranberry Bog SSSI. Whilst we understand the need to protect the SSSI we feel the incorporation of this measure into the provisions relating to the Travel Plan and Public Transport Strategy is not the correct location. Travel Plan's principally seek to reduce motorised vehicle traffic and promote sustainable travel choice. They can include provisions for routing but such an undertaking to protect the SSSI has not been previously discussed with the Highway Authority who will be responsible for monitoring the successful implementation of the Travel Plan. We are also mindful that the impact on the SSSI from traffic will vary dependent on the type of vehicle passing through.</p> <p>As we understand from the Examination hearings this matter was raised by Natural England and therefore they would be better placed to consider the mitigation strategy on the SSSI. We therefore consider the final sentence of criteria 13 should be removed and become a standalone criteria in its own right with the amendments suggested below. It may be that this can ultimately be included within the Travel Plan as part of the Planning Application process and liaison with Natural England. However, for the Policy we feel as things stand the two should be kept distinct.</p> <p>Further on criteria 13 the final sentence added is not accurate and needs to be changed. Bus services will be provided via S106 and not as part of the Travel Plan. The Travel Plan can set out what is to be provided and measures to encourage use but the physical provision of the service itself will be via S106 contribution. The public transport strategy should also be required to have regard to the Employment and Skills Plan in terms of identifying workforce locations and targeting services. Also, reference to demand response schemes is not necessary.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed	1. Remove the following text from Criteria 13:

Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>'Travel planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531.'</p> <p>And replace with the following:</p> <p>Implementation of an agreed strategy to Travel planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531.</p> <p>2. Amend the final sentence of the main paragraph in criteria 13 as follows:</p> <p>The provision of public transport strategy as part of the travel plan (including demand response schemes) should demonstrate service provision that it can be sustained in the long-term and has taken into account the advice of local transport authorities at Cheshire East and Staffordshire County Council, including having regard to the Employment and Skills Plan.</p>
Comment ID	199
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM104
Q4page - Page	68 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	TK27
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MM104 proposes to amend Criteria 8 to require an assessment of the need for off-site highway improvements including at the Coppice Road / Merelake Road / Coalpit Hill Junction, and offsite footway improvements.</p> <p>The Coppice Road / Merelake Road / Coal Pit Lane (Swan Bank) Junction is a non-standard arrangement. Essentially, Coppice Road and Merelake Road run parallel to one another and converge at Coalpit Hill in a single junction. No assessment is required to determine the need for improvements as it is evident that any extra traffic using the junction would cause safety concerns. The development of TK27 should be required to address this and provide a solution either at the junction or within the allocation that is acceptable to the Highway Authority.</p> <p>Coppice Road on the Allocation side is also devoid of a footway therefore it is clear a footway will need to be provided as part of the development that safely connects into the existing provision. Wider improvements to the footway network to connect to existing facilities and amenities could be determined through further assessment.</p> <p>It is suggested the original text is re-inserted with minor amendment to reflect the above</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Replace the proposed change to Criteria 8 with the below:</p> <p>Highway improvements required to address highway safety at Coppice Road / Merelake Road / Coalpit Hill (Swan Bank) Junction. Provision of a footway on Coppice Road along the site frontage and an assessment of the need for improvement of the footway from the site to local school, bus stops and shops.</p>
Comment ID	189
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James

Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM27
Q4page - Page	21 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 9 Retail
Q4policypara - Policy / Paragraph	RET3 Restaurants, Cafes, Pubs and Hot Food Takeaways
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>From a public health perspective, we support the proposed change in wording to Paragraph 5.41a and the change to Policy RET3</p> <p>The change allows for planning permission not to be granted where there would be an adverse impact on health and wellbeing. In Newcastle-under-Lyme, the prevalence of overweight (including obesity) for reception aged children is 25.4%, and for year 6 children it is 41.0% (using the last three years of data combined). The percentage of children moving from a healthy weight in reception to overweight (including obesity) in year 6 is 23.1% .</p> <p>We support the restriction of Hot Food Takeaways (HFTs) and Fast Food Outlets (FFOs) within walking distance of schools. 400m is considered to equate to a 5-minute walking distance and a reasonable distance considered for people to walk, for example, to a bus stop. However, according to evidence cited by the Town and Country Planning Association, 800m is generally considered a 'standard walkable distance.' Stopping new outlets from opening within 800m would help to reduce the appeal and accessibility during lunchtimes, for older pupils, and after school, including for primary school pupils, as there is a possibility that parents and carers may purchase food from these outlets on the way home, or at a later stage. An impact study on takeaways near secondary schools in Brighton and Hove found that a 400m boundary would not sufficiently cover the areas used by pupils and that an 800m radius was more relevant . Local evidence set out in Wyre Forest's District Local Plan highlights that exposure to at least one FFO within 1 mile of home and within 1 mile of school were both associated with a higher proportion of children becoming obese.</p> <p><i>Officer note: See attached for details of weblinks and data sources</i></p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Whilst we support the provisions in the Plan around Hot food takeaways, as noted above, we believe the Plan would be more effective if the 400m restriction was increased to 800m.</p>
Attachments	1307641__Staffs CC_MM09_MM27.docx
Comment ID	193
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM33
Q4page - Page	24 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 10 Infrastructure and Transport
Q4policypara - Policy / Paragraph	IN2 Supporting Information
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes

Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	MM33 para 10.15 – text has been added at the beginning to say For dev proposals, transport models will be required to use robust datasets. We believe the wrong terminology has been applied here and ‘Assessments’ should have been used instead of ‘models’. Use of Assessments would ensure robust datasets for active travel can also be considered and also for consistency with transport provisions in the NPPF and the Local Plan in general.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	To amend Paragraph 10.15, as follows: - For development proposals, Transport models Assessments will be required to use robust datasets which show the effect of including sustainable transport networks and local facilities into new developments should be collated and presented
Comment ID	197
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps
Q4ref - MM Reference	PM03
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	The safeguarded route effectively consists of 3 sections, which is shown on the Interactive Policies Map. However, it is noted that the static map (PM03) only shows the section in TB19 and the section between TB19 and KL13, the stretch through KL13 to the A525 is missing.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Changes are required to the Policy wording and Policies map to make it clear which sections of the safeguarded route are to be the subject of developer contributions and those that are to be provided directly by KL13 and TB19. The static Policies Map also needs to ensure inclusion of the section within KL13 is included.
Comment ID	190
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications

Q4ref - MM Reference	MM10
Q4page - Page	10 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD7 Design
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	The proposed changes to criteria 9 text currently says that LTN1/20 is used for cycle infrastructure design. This should be amended to say walking, wheeling and cycling infrastructure for completeness and accuracy.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Amend criteria 9 as follows: 9. To support the delivery of high quality walking, wheeling and cycle infrastructure in the Borough, development should take account of Department for Transport Local Transport Note 1/20 as updated and Local Walking and Cycling Plans in scheme design.
Comment ID	194
Response Date	17/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM47
Q4page - Page	33 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4policypara - Policy / Paragraph	SE4 Supporting Information 11.16a
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	National Standards for Sustainable Drainage Systems have been published and prioritise the collection of surface water Ruoff for non-potable use. This sits above infiltration and essentially promotes the use of features that collect runoff such as water butts, rain gardens etc., to provide as much source control as possible. Included below is the table from the National SuDS Standards below. This section would benefit from being updated to include the collection of surface water for non-potable use in the list of approaches. <i>Officer note: see attached for details of National SuDS Standards table</i>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local	Add to 11.16a a new point a. in the list: a. Collected for non-potable water.

Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	
Attachments	1307641_Staffs CC_MM47.docx
Comment ID	198
Response Date	18/12/2025 16:06:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM90
Q4page - Page	61 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	SP11
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The changes proposed in MM90 to Policy SP11 do not address the changes made to Policies KL13, TB19 and KL15 in relation to the way in which the transport connection between A525 Keele Road and the A53 Whitmore Road. This connection is now referred to as a 'Safeguarded Route' and KL15 references developer contributions towards completion of the Safeguarded Route.</p> <p>SP11 criteria 16 states 'Financial contributions to highways improvements including to facilitate the distribution of traffic from the A525 to Whitmore Road.' The latter part of this requirement should have been updated to mirror wording in Policy KL15 in relation to contribution to the route.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>SP11 criteria 16 needs updating to mirror wording used in KL15 in relation to the contribution to the Safeguarded Route between the A525 and Whitmore Road. Subject to changes potentially required to MM78 and PM03.</p>

Comment ID	98
Response Date	16/12/2025 09:54:00
Consultee Family Name	Clewes
Consultee Given Name	Martine
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM70
Q4page - Page	50 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy AB15 'land north of Vernon Avenue'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I strongly object to the modifications suggested for AB15. Essential protections are reduced and there are potential ground risks that a simple assessment will not find. The wording uses is vague and open to interpretation and I feel that due to the recent planning permission granted for the 39 dwellings at New Farm, this deletes the need for the AB15 Development.</p> <p>There is a reduced need for this development due to the recent approval of 39 dwellings at New farm, Cross Lane. Thes 39 dwellings contribute to the housing supply numbers and as such should be no need for AB15 to be developed.</p> <p>I strongly believe that the medieval field system that should be adhered to has now been replaced with a simple recording system thus historic features are at risk and weakens the compliance with National Heritage Policy</p> <p>It is noted that with the removal of SA 1, important rules for access, safety, heritage, environmental protection and infrastructure, leaves the site at risk of poor regulation and limits residents protection</p> <p>The terminology used in the proposal is vague and open to interpretation. Without clearly defined measures, developers are afforded carte-blanche opportunities to interpret the policy as they wish.</p> <p>It appears the policy only warrants a basic land contamination assessment and as this is in a mining area, this basic assessment will not determine any instability such as hidden voids and subsidence risks. In depth land surveys should be required to detail this and ensure all is safe.</p>
Comment ID	97
Response Date	16/12/2025 09:54:00
Consultee Family Name	Clewes
Consultee Given Name	Martine
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I continue to strongly object to this development and despite the planning inspector seeking further information around this site due to the serious concerns they have about the size of this proposed development. I would like to make the following comments:</p> <p>Whilst I support the requirement of a micro-simulation model to determine the impact on the road system (AB2 Para 7) It is essential to consider the current situation on the A500 where each junction is grade separated – on two levels apart from one, the one having a very large roundabout. There would be a large cost attached to developing the proposed junction and this should be considered prior to the Local Plan being adopted.</p> <p>The problems on the A500 exist every day and this should be fully considered with traffic figures that are up to date and reflect the current situation, not the out-of-date ones presented by the developers, the junction is very often backed up ad when there is an accident on the M6 this makes a daily situation even worse. Any projections are underestimated if the data used is not current. This is a route I travel regularly and the amount of traffic has increased over the past few years as has the number of accidents and congestion. There is the obvious environmental impact of such large numbers of transport vehicles accessing the site.</p> <p>How is the Moat Lane emergency use going to be policed at times of crisis? What exactly is emergency use as inevitably it will lead to HGV's and employees' vehicles clogging up a road system that is rural and not made for this amount of traffic – it is human nature to find the quickest route or ways around when the A500/M6 is at a standstill</p>

Where is it shown how the routing of traffic past Black Firs and Craddock's Moss is going to be discouraged? Surely this is something that should be determined prior to the adoption of The Local Plan?
AB2 Para 13

A landscape and visual assessment is welcomed (AB2 Para 9) but the removal of green spaces between footpaths (9 and 22 Audley) is not acceptable and the replacement of these with green corridors does not enhance public right of way nor does it support the need for open fields to protect and support wildlife

Comment ID	139
Response Date	17/12/2025 12:56:00
Consultee Family Name	Coupe
Consultee Given Name	M
Agent Family Name	Willard
Agent Given Name	Gez
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM90
Q4page - Page	61 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	SP11 incl. Figure 5 Site Arrangement
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Not legally compliant</p> <p>This submission relates to Policy and site SP11.</p> <p>It is considered that the plan is biased with elements of pre-determination. This is set out below.</p> <p>I have been involved closely with 2 initially proposed allocations at Bignall End/Audley (AB12) and at Keele (SP11). My interest is on behalf of landowners adjoining these proposed allocations. Their intent was seek to secure changes to the plan to secure the allocation of their sites (AB75 & SP12) as additions to the draft allocation sites (AB12 & SP11) that they adjoined.</p> <p>In following closely these draft allocations I am struck by the apparent pre-determination and bias in these draft allocations given that in both cases the draft allocations were on land that (insofar as is known) comprises land owned or controlled by either the Borough or the County Council.</p> <p>In the case of the Bignall End site (AB12) this matter manifested itself in an unwillingness by either Borough Council as Local planning Authority or County Council as land owner (and Highway Authority) over many years to respond to approaches intended to secure both a joint allocation, boost planning gains and most critically to secure a safe and secure means of access to the development site. An independent highway report was commissioned by my client to show that a suitable and safe access to a combined site could be provided. The same report also evidenced that the access proposed in the draft allocation was neither safe nor suitable in highway terms.</p> <p>Both Councils as land owner and Local Planning Authority ignored all approaches. The Highway Authority (based within and part of the County Council) without the support any reasoned report or safety audit of their own made public, supported the ill fated allocation site (AB12) despite the main access to this large housing site needing to use Diglake Street which is a narrow street lined with terraced housing with significant on street parking. I have no doubt whatsoever that, all other things being equal, any planning application submitted by a private landowner for site AB12 would not have found such Highway Authority support.</p> <p>Quite properly the draft allocation of AB12 was removed from the draft plan following your direction contained with your advice dated 1st August 2025. You will recall you stated:</p> <p><i>"AB12 – Diglake Street, Audley 25. Based on the evidence put to me at the hearing and my observations on site, the access arrangement for the site is likely to have a detrimental effect on the amenity of adjoining occupiers on Diglake Street due to the narrow nature of the adjoining streets and the high preponderance of on-street parking, particularly at weekends. I am not convinced that the provision of off-street parking within the development site would be an appropriate solution. The site should be removed from the Plan.</i></p> <p>The Council removed the allocation without any attempt to defend or justify it after your intervention as inspector.</p> <p>This matter now of course is in the past. However it leaves a significant element of doubt as to the Council's impartiality and (Council) bias in preparing its land use plan. As a long standing practitioner of Land use planning I have always held to the view and practice that planning decisions should be ownership blind and based solely upon what is in the public interest as for as the use and development of land is concerned. Pre-determination and clear bias by a Council have no place in either the planning application process nor in policy formulation.</p> <p>This brings me to the final draft plan and the allocations of the Lyme Park (SP11) with 4 significant housing sites within it. My interest again is on behalf of an adjoining landowner and their now not allocated site (SP12) which abuts the proposed County Park allocation but which was previously within the Country Park allocation.</p> <p>My client has consistently sought over many years to be involved as a secondary partner working with the Borough Council as owner of the former Golf Course which is now the combined Country Park and housing site. Numerous approaches have been made to the planning policy team over recent years but they have failed to engage in any positive discussion or open discussion about including the site SP12</p>

together with SP11. The result now is a final draft plan which excludes site (SP12) from the plan despite it being offered for allocation and being equally suitable for inclusion within the Country Park or for development purposes.

The result is to leave site (SP12) surrounded by existing housing to one side (East) and Country Park allocation to the other (West). It would remain in the Green Belt.

There is no land use planning reason for this site (SP12) not to be included within the Country Park. Indeed that had been the Council's proposal in the previous draft plan (upon which my client was not consulted) and remained so until revisions submitted after the close of the inquiry.

The reason for this is plain.

To include the site (SP12) and require its delivery as part of the Country Park/Housing allocation would require a joint approach and a pro rata share of the development value. The Council and Planning Authority clearly do not want this. Matters such as development profit sharing should of course should not form any part of the land use and planning policy allocations process or indeed their modus operandi especially where the sole beneficiary of 'uplift' would be the Council as served by its planning authority. This should not be how things are planned and this should not be seen to be the way in which developments are planned.

This is nevertheless what the final draft plan would deliver. The sole financial beneficiary, it is understood, would be the same council preparing the plan. The Council never have no intention of sharing development value with a non public sector body and it has been biased and pre-determinative in its draft policy formulation in order to prevent the sharing of development gain with a non public sector actor. I would suggest that a detached and impartial observer of the matter in hand would not come to any other rational conclusion as to why SP12 was not included within the SP11 allocation.

Such abuses of the planning policy making system run counter to sound governance, good practice and especially the objectives of the Nolan Commission which in 1994 sought to establish robust principles for conduct in public life. The 7 principles the commission set out remain a good and true measure of conduct in public life. The Government's own web site describes the seven principles:

- 1 Selflessness Holders of public office should act solely in terms of the public interest.
- 2 Integrity Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- 3 Objectivity Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- 4 Accountability Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- 5 Openness Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- 6 Honesty Holders of public office should be truthful.
- 7 Leadership Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

In the formulation of policy SP11 in respect of this site one cannot help but conclude that the Local planning Authority ; as a public body, have not behaved without self interest, lack integrity and have not been objective. Had they behaved properly in this matter they would have included site SP12 within the Country Park/Housing allocation and either worked with the landowner to achieve this or acquired the site from them with the same aim of securing their land use planning objectives fully.

Not Sound - matters

The Country Park and Housing allocations under SP11 are considered unsound for the following reasons:

• Lack of evidential need for a 2nd Country Park.

The plan and its previous incarnations, which did not provide for this Lyme Country Park, contains no evidential base to support its provision. There is no evidence of a deficiency of public open space or indeed specifically of any need for a 2nd Country Park to the West of Newcastle under Lyme which is already served by the extensive Apedale Country Park.

In light of the future costs to the public purse of the provision and maintenance of such a Country Park it ought to be a matter of public record that there is an unmet need for such a park. There is no such evidential base. It is most likely that the provision is one of short term political expediency. The Council should evidence otherwise.

• Site SP11 is too constraining

The allocations of sites SP11 (1) to SP11 (4) are not supported by any publicly available records regarding topography, ecology, landscape features, ground conditions, hydrology etc..... that would normally inform such precise boundary allocations. The precise boundaries and housing numbers prescribed to them to all intents and purposes have arisen out of thin air. This both makes for inflexible plan making and at this strategic stage is unnecessary. In adopting a revised site boundary to SP11 (which should include SP12) the plan should simply allocate for the provision within the plan of its housing target and a Country Park. This would leave the location of the housing within the allocation site boundary to be truly determined only after base line design and development (topography, ecology, landscape, hydrology and ground conditions reports etc....had been completed and a masterplan prepared.

The Country Park boundary now omits site SP12 and leaves this land with no planning designation aside from Green Belt status (which may in any event be later claimed as Grey Belt). As site SP12 has been offered on numerous occasions to be a part of the County Park; as it should logically be, this changed position of the Council makes no land use planning sense. It is Proposed that site SP12 is now excluded because the Council would have to share some development gains from the development of the housing sites within SP11 with another party. This is not however a land use planning matter. If there is a need

for a Country Park in this location then it ought to logically have a boundary and extent sufficient to meet its needs and which does not compromise the usability of future prospects of SP12.

• The development boundaries set out within policy SP11 to do not accord with sound and long established principles for providing robust boundaries to the Green Belt.

The final draft plan (figure 5) shows development areas which have no relationship with each other or with the existing outer urban edge of the conurbation. They are isolated pockets of hard development in the Green Belt which run counter to the long standing principle of Green Belt policy which is to keep land permanently open. The allocations are sprawling and constitute encroachment into the Countryside.

These are new development areas within the Green Belt. They would by virtue of their siting, extent and configuration harm the long term protection of the Green Belt in this area and they could in the future serve as islands of development to be later infilled if the Western edge of the conurbation were to push further outwards.

No consideration whatsoever appears to have been given to simply adding the housing areas now proposed to the outer edge of the area in a form of suitable urban extensions (SUE). The Council should explain why this is the case. A masterplan could and should examine such an option. A 'tighter' area of development to the Western edge of the town would provide for a much more defensible and sustainable urban edge to the Green Belt. It has not been considered so far.

The present NPPF advises at paragraph 148:

".....However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

It is contested that these development allocations with SP11 are not sustainable and not in accord with policy and principles when Green Belts are being reviewed as they are in this case.

The NPPF advises in respect of Green Belt boundaries.

"149. When defining Green Belt boundaries, plans should:

- (a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- (b) not include land which it is unnecessary to keep permanently open;*
- (c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- (d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- (e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- (f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*

These development allocations do not use physical features that are readily recognisable and likely to be permanent and would establish development islands that may need to change in the future. Accordingly the development areas under SP11 do not comply with national planning guidance in respect of Green Belt policy and boundary formulation.

Note It is important to be aware that under current Government proposals within the next few years this Council is likely to dissolved and replaced as part of a much larger split Staffordshire Council. Local development and financial priorities will change if the financial provisions for the Country Park are not securely locked in.

Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>A To revise the boundary to the Country Park and Housing allocations under SP11 in order to include site SP12 within the combined Country Park and Housing area of SP11.</p> <p>B To remove specific site boundaries SP11 (1) to SP11 (4) the housing allocations and simply set a housing target within a combined Lyme Country Park/Housing allocation boundary which also includes site SP12. Any future planning application will be required to show that development areas ought to best protect the countryside from encroachment and to ensure development areas accord with sustainable principles and respect the functions and features off the Green Belt.</p> <p>C To include within policy SP11 a requirement to deliver all of the Lyme County Park in its fullest extent and to put in place a long term management plan before the occupation of any dwelling within the allocation. This is possibly the only way to prevent the Borough Council defaulting on its intention as Council budgets are likely to remain strained.</p>
Comment ID	181
Response Date	17/12/2025 12:56:00
Consultee Family Name	Coupe
Consultee Given Name	M
Agent Family Name	Willard
Agent Given Name	Gez

Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM90
Q4page - Page	69 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB12
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Not legally compliant</p> <p>This submission relates to Policy and site SP11.</p> <p>It is considered that the plan is biased with elements of pre-determination. This is set out below.</p> <p>I have been involved closely with 2 initially proposed allocations at Bignall End/Audley (AB12) and at Keele (SP11). My interest is on behalf of landowners adjoining these proposed allocations. Their intent was seek to secure changes to the plan to secure the allocation of their sites (AB75 & SP12) as additions to the draft allocation sites (AB12 & SP11) that they adjoined.</p> <p>In following closely these draft allocations I am struck by the apparent pre-determination and bias in these draft allocations given that in both cases the draft allocations were on land that (insofar as is known) comprises land owned or controlled by either the Borough or the County Council.</p> <p>In the case of the Bignall End site (AB12) this matter manifested itself in an unwillingness by either Borough Council as Local planning Authority or County Council as land owner (and Highway Authority) over many years to respond to approaches intended to secure both a joint allocation, boost planning gains and most critically to secure a safe and secure means of access to the development site. An independent highway report was commissioned by my client to show that a suitable and safe access to a combined site could be provided. The same report also evidenced that the access proposed in the draft allocation was neither safe nor suitable in highway terms.</p> <p>Both Councils as land owner and Local Planning Authority ignored all approaches. The Highway Authority (based within and part of the County Council) without the support any reasoned report or safety audit of their own made public, supported the ill fated allocation site (AB12) despite the main access to this large housing site needing to use Diglake Street which is a narrow street lined with terraced housing with significant on street parking. I have no doubt whatsoever that, all other things being equal, any planning application submitted by a private landowner for site AB12 would not have found such Highway Authority support.</p> <p>Quite properly the draft allocation of AB12 was removed from the draft plan following your direction contained with your advice dated 1st August 2025. You will recall you stated:</p> <p><i>"AB12 – Diglake Street, Audley 25. Based on the evidence put to me at the hearing and my observations on site, the access arrangement for the site is likely to have a detrimental effect on the amenity of adjoining occupiers on Diglake Street due to the narrow nature of the adjoining streets and the high preponderance of on-street parking, particularly at weekends. I am not convinced that the provision of off-street parking within the development site would be an appropriate solution. The site should be removed from the Plan.</i></p> <p>The Council removed the allocation without any attempt to defend or justify it after your intervention as inspector.</p> <p>This matter now of course is in the past. However it leaves a significant element of doubt as to the Council's impartiality and (Council) bias in preparing its land use plan. As a long standing practitioner of Land use planning I have always held to the view and practice that planning decisions should be ownership blind and based solely upon what is in the public interest as for as the use and development of land is concerned. Pre-determination and clear bias by a Council have no place in either the planning application process nor in policy formulation.</p> <p>This brings me to the final draft plan and the allocations of the Lyme Park (SP11) with 4 significant housing sites within it. My interest again is on behalf of an adjoining landowner and their now not allocated site (SP12) which abuts the proposed County Park allocation but which was previously within the Country Park allocation.</p> <p>My client has consistently sought over many years to be involved as a secondary partner working with the Borough Council as owner of the former Golf Course which is now the combined Country Park and housing site. Numerous approaches have been made to the planning policy team over recent years but they have failed to engage in any positive discussion or open discussion about including the site SP12 together with SP11. The result now is a final draft plan which excludes site (SP12) from the plan despite it being offered for allocation and being equally suitable for inclusion within the Country Park or for development purposes.</p> <p>The result is to leave site (SP12) surrounded by existing housing to one side (East) and Country Park allocation to the other (West). It would remain in the Green Belt.</p> <p>There is no land use planning reason for this site (SP12) not to be included within the Country Park. Indeed that had been the Council's proposal in the previous draft plan (upon which my client was not consulted) and remained so until revisions submitted after the close of the inquiry.</p> <p>The reason for this is plain.</p>

To include the site (SP12) and require its delivery as part of the Country Park/Housing allocation would require a joint approach and a pro rata share of the development value. The Council and Planning Authority clearly do not want this. Matters such as development profit sharing should of course should not form any part of the land use and planning policy allocations process or indeed their modus operandi especially where the sole beneficiary of 'uplift' would be the Council as served by its planning authority. This should not be how things are planned and this should not be seen to be the way in which developments are planned.

This is nevertheless what the final draft plan would deliver. The sole financial beneficiary, it is understood, would be the same council preparing the plan. The Council never have no intention of sharing development value with a non public sector body and it has been biased and pre-determinative in its draft policy formulation in order to prevent the sharing of development gain with a non public sector actor. I would suggest that a detached and impartial observer of the matter in hand would not come to any other rational conclusion as to why SP12 was not included within the SP11 allocation.

Such abuses of the planning policy making system run counter to sound governance, good practice and especially the objectives of the Nolan Commission which in 1994 sought to establish robust principles for conduct in public life. The 7 principles the commission set out remain a good and true measure of conduct in public life. The Government's own web site describes the seven principles:

- 1 Selflessness Holders of public office should act solely in terms of the public interest.
- 2 Integrity Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.
- 3 Objectivity Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- 4 Accountability Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- 5 Openness Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- 6 Honesty Holders of public office should be truthful.
- 7 Leadership Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

In the formulation of policy SP11 in respect of this site one cannot help but conclude that the Local planning Authority ; as a public body, have not behaved without self interest, lack integrity and have not been objective. Had they behaved properly in this matter they would have included site SP12 within the Country Park/Housing allocation and either worked with the landowner to achieve this or acquired the site from them with the same aim of securing their land use planning objectives fully.

Not Sound - matters

The Country Park and Housing allocations under SP11 are considered unsound for the following reasons:

• Lack of evidential need for a 2nd Country Park.

The plan and its previous incarnations, which did not provide for this Lyme Country Park, contains no evidential base to support its provision. There is no evidence of a deficiency of public open space or indeed specifically of any need for a 2nd Country Park to the West of Newcastle under Lyme which is already served by the extensive Apedale Country Park.

In light of the future costs to the public purse of the provision and maintenance of such a Country Park it ought to be a matter of public record that there is an unmet need for such a park. There is no such evidential base. It is most likely that the provision is one of short term political expediency. The Council should evidence otherwise.

• Site SP11 is too constraining

The allocations of sites SP11 (1) to SP11 (4) are not supported by any publicly available records regarding topography, ecology, landscape features, ground conditions, hydrology etc..... that would normally inform such precise boundary allocations. The precise boundaries and housing numbers prescribed to them to all intents and purposes have arisen out of thin air. This both makes for inflexible plan making and at this strategic stage is unnecessary. In adopting a revised site boundary to SP11 (which should include SP12) the plan should simply allocate for the provision within the plan of its housing target and a Country Park. This would leave the location of the housing within the allocation site boundary to be truly determined only after base line design and development (topography, ecology, landscape, hydrology and ground conditions reports etc....had been completed and a masterplan prepared.

The Country Park boundary now omits site SP12 and leaves this land with no planning designation aside from Green Belt status (which may in any event be later claimed as Grey Belt). As site SP12 has been offered on numerous occasions to be a part of the County Park; as it should logically be, this changed position of the Council makes no land use planning sense. It is Proposed that site SP12 is now excluded because the Council would have to share some development gains from the development of the housing sites within SP11 with another party. This is not however a land use planning matter. If there is a need for a Country Park in this location then it ought to logically have a boundary and extent sufficient to meet its needs and which does not compromise the usability of future prospects of SP12.

• The development boundaries set out within policy SP11 to do not accord with sound and long established principles for providing robust boundaries to the Green Belt.

The final draft plan (figure 5) shows development areas which have no relationship with each other or with the existing outer urban edge of the conurbation. They are isolated pockets of hard development in the Green Belt which run counter to the long standing principle of Green Belt policy which is to keep land permanently open. The allocations are sprawling and constitute encroachment into the Countryside.

These are new development areas within the Green Belt. They would by virtue of their siting, extent and configuration harm the long term protection of the Green Belt in this area and they could in the future

	<p>serve as islands of development to be later infilled if the Western edge of the conurbation were to push further outwards.</p> <p>No consideration whatsoever appears to have been given to simply adding the housing areas now proposed to the outer edge of the area in a form of suitable urban extensions (SUE). The Council should explain why this is the case. A masterplan could and should examine such an option. A 'tighter' area of development to the Western edge of the town would provide for a much more defensible and sustainable urban edge to the Green Belt. It has not been considered so far.</p> <p>The present NPPF advises at paragraph 148:</p> <p><i>".....However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."</i></p> <p><i>It is contested that these development allocations with SP11 are not sustainable and not in accord with policy and principles when Green Belts are being reviewed as they are in this case.</i></p> <p><i>The NPPF advises in respect of Green Belt boundaries.</i></p> <p><i>"149. When defining Green Belt boundaries, plans should:</i></p> <p><i>(a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;</i></p> <p><i>(b) not include land which it is unnecessary to keep permanently open;</i></p> <p><i>(c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;</i></p> <p><i>(d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;</i></p> <p><i>(e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and</i></p> <p><i>(f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."</i></p> <p>These development allocations do not use physical features that are readily recognisable and likely to be permanent and would establish development islands that may need to change in the future. Accordingly the development areas under SP11 do not comply with national planning guidance in respect of Green Belt policy and boundary formulation.</p> <p><i>Note It is important to be aware that under current Government proposals within the next few years this Council is likely to dissolved and replaced as part of a much larger split Staffordshire Council. Local development and financial priorities will change if the financial provisions for the Country Park are not securely locked in.</i></p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>A To revise the boundary to the Country Park and Housing allocations under SP11 in order to include site SP12 within the combined Country Park and Housing area of SP11.</p> <p>B To remove specific site boundaries SP11 (1) to SP11 (4) the housing allocations and simply set a housing target within a combined Lyme Country Park/Housing allocation boundary which also includes site SP12. Any future planning application will be required to show that development areas ought to best protect the countryside from encroachment and to ensure development areas accord with sustainable principles and respect the functions and features off the Green Belt.</p> <p>C To include within policy SP11 a requirement to deliver all of the Lyme County Park in its fullest extent and to put in place a long term management plan before the occupation of any dwelling within the allocation. This is possibly the only way to prevent the Borough Council defaulting on its intention as Council budgets are likely to remain strained.</p>

Comment ID	135
Response Date	17/12/2025 21:58:00
Consultee Family Name	Cuthbert
Consultee Given Name	Kim
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>1. Harm to Rural Character and Loss of Agricultural Land</p> <p>The allocation of the AB2 site for large-scale industrial development would cause significant and permanent damage to the rural environment and local amenity. The site currently forms part of an open, productive agricultural landscape that contributes to the character, setting, and wellbeing of the surrounding rural community.</p> <p>The development would result in the permanent loss of a substantial area of countryside, replacing open fields with large industrial buildings that are wholly out of scale with their surroundings. In addition, the removal of productive farmland from use would reduce local food production capacity, directly contradicting wider sustainability and food security objectives. The transformation of this land into an industrial estate would fundamentally alter the character of the area, with no realistic mitigation capable of offsetting this harm.</p> <p>2. Severe Traffic, Safety, and Infrastructure Impacts</p> <p>The proposed employment allocation, potentially accommodating up to 3,500 workers, would place intolerable strain on an already overstretched road network and village infrastructure.</p> <p>The A500 and its junction with the M6 already suffer from frequent congestion, delays, and collisions, operating at or beyond capacity. The proposal relies heavily on a single main access point, creating a significant vulnerability in the network. Any disruption on the A500 or M6 would inevitably lead to drivers seeking alternative routes through narrow rural lanes such as Park Lane, Moat Lane, and Barthomley Road.</p> <p>These lanes are unsuitable for increased traffic volumes and are regularly used by walkers, cyclists, horse riders, and local residents, including elderly and disabled individuals. Even a relatively small proportion of staff attempting to bypass congestion could result in hundreds of additional vehicles using these roads, leading to gridlock, unsafe conditions, blocked access for residents, and serious risks to vulnerable users.</p> <p>There is also a strong likelihood that employees would park along these lanes and walk to the site in order to avoid congestion, further exacerbating safety concerns and making the lanes effectively unusable for their intended rural and recreational purposes. Designating these routes for emergency access would be irresponsible and would significantly increase the risk of serious accidents.</p> <p>While infrastructure works such as a flyover may be required to mitigate some impacts, this raises serious questions about the viability of the site. Importantly, such measures would still not prevent the routine misuse of rural lanes during frequent standstills on the A500 and M6.</p> <p>3. Flood Risk and Environmental Unsuitability</p> <p>Parts of the AB2 site, particularly near Moat Lane, are affected by persistent flooding linked to an ancient moat and underlying drainage issues. Moat Lane itself is frequently damaged and closed due to flood-related deterioration, demonstrating the fragility of the existing infrastructure.</p> <p>Large-scale development would significantly worsen these conditions through the replacement of absorbent grassland with impermeable surfaces, increasing surface water runoff during heavy rainfall. Proposed earth mounding would further displace water onto surrounding roads and neighbouring land, increasing both the frequency and severity of flooding events.</p> <p>Nearby properties already experience difficulties with access during periods of heavy rain, and further development risks rendering them inaccessible altogether at times. There is also a clear risk of long-term structural damage to buildings and infrastructure due to exacerbated flood conditions. These factors strongly indicate that the site is fundamentally unsuitable for development of this scale.</p> <p>4. Insufficient Evidence and Unresolved Mitigation</p> <p>Although the Planning Inspector expressed serious reservations regarding the scale of development at the A500/M6 junction, AB2 remains within the Plan. While the requirement for a detailed micro-simulation traffic model is welcomed, this work must be completed before adoption of the Local Plan, particularly given the likelihood that a grade-separated junction or flyover would be required. The cost and deliverability of such infrastructure could fundamentally undermine the viability of the site.</p>

	<p>Any mitigation proposals must be based on up-to-date traffic data that reflects current conditions, not outdated figures that significantly underestimate existing problems. There must also be a clear and enforceable definition of “emergency use” of Moat Lane, strictly limited to emergency service vehicles and explicitly excluding HGVs and employee traffic when the main access route is congested or closed.</p> <p>Furthermore, robust measures to prevent traffic routing past Black Firs and Craddock’s Moss SSSIs must be clearly demonstrated prior to adoption, to ensure these nationally important sites are genuinely protected.</p> <p>5. Landscape, Public Rights of Way, and Biodiversity</p> <p>I support the requirement for a full Landscape and Visual Impact Assessment. However, I strongly object to the removal of the large open green space between public footpaths Audley 9 and 22 and its replacement with narrow “green corridors.” These corridors would be enclosed by large warehouse buildings, significantly diminishing the experience of these rights of way and failing to compensate for the loss of open countryside.</p> <p>Such an approach would also lead to the loss of farmland bird species that rely on open fields rather than hedge-lined pathways, resulting in a clear net loss to biodiversity.</p> <p>Conclusion</p> <p>For the reasons set out above, Allocation AB2 should be removed from the Local Plan. The proposal would cause unacceptable harm to rural character, road safety, infrastructure capacity, flood resilience, biodiversity, and local wellbeing. The scale of development is entirely disproportionate to its rural setting, and the concerns of the local community remain unresolved.</p> <p>Approving AB2 would prioritise developer convenience over sustainability, safety, and the long-term interests of existing residents. I therefore urge the Council to reconsider this allocation and prevent the irreversible damage that would result from its inclusion.</p>
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Allocation AB2 should be removed from the Local Plan as it would result in significant and lasting harm to the rural environment, highway safety, local infrastructure, and flood resilience. The proposed scale and intensity of development are wholly incompatible with the character and capacity of this rural location, and the sustained objections raised by the local community have not been adequately resolved.</p> <p>Proceeding with AB2 in its current form would place disproportionate emphasis on developer aspirations at the expense of resident safety, environmental protection, and long-term sustainability. For these reasons, the Council is urged to reconsider this allocation to avoid irreversible adverse impacts.</p> <p>To ensure the Local Plan is sound, justified, and deliverable, the following matters must be addressed prior to adoption, not deferred to later stages:</p> <ul style="list-style-type: none"> • A comprehensive investigation into ground stability and mining-related risks must be undertaken. This should extend beyond a basic contamination assessment and fully assess historic mining activity and its implications for large-scale development. • A detailed micro-simulation traffic model assessing cumulative highway impacts must be completed and published before the Plan is adopted. Existing traffic conditions are already severe, and current modelling assumptions significantly underestimate real-world congestion and disruption. • The definition of “emergency use” of Moat Lane must be explicit and enforceable, restricting access solely to emergency service vehicles and excluding HGVs and employee traffic during periods of congestion or network failure. • Clear, deliverable measures to prevent traffic routing past Black Firs and Craddock’s Moss SSSIs must be identified and demonstrated in advance, to ensure these nationally important sites are not harmed by displacement traffic. • The extensive open green space between public footpaths Audley 9 and 22 should be retained in full. Replacing this area with narrow green corridors would degrade public rights of way, diminish their rural character, and result in the loss of open-field habitat essential for farmland bird species. <p>Addressing these issues is essential to ensure the Plan meets the tests of soundness by being justified, effective, and consistent with national policy. Without these safeguards, the allocation would remain undeliverable, environmentally damaging, and contrary to the interests of the local community.</p>

Comment ID	65
Response Date	14/12/2025 11:08:00
Consultee Family Name	Darlington
Consultee Given Name	Andrew
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Dear Planning Inspector,</p> <p>I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>Issues over the proposed release of 80 hectare of green belt land at AB2.</p> <ol style="list-style-type: none"> 1. The developer had applied for Emergency access to site AB2 via Park Lane and or Moat Lane, Barthomley Road. Walkers , horse riders, dog walkers, families on bikes, and runners all use this network of single track lanes around AB2 any increase in traffic will have a great detrimental impact on these activities. 2. Indurent are anticipating 3500 job opportunities on completion of AB2; potentially this could mean an extra 3500 vehicles using the road network several times a day to gain access on and off site. This is infeasible whether constructing a new access point off A500 or via the single track country lanes. 3. Access via Park Lane(a single track width road, hardly more than a farm track, with no pavements, curbs and in some places potholed, just the odd passing place for vehicles to squeeze by one another. Any increase in traffic flow would inevitably result in a daily grid lock making it difficult for residents to leave home especially during peak times. 4. It would clearly necessitate the widening of the said single track Lanes to make them fit for purpose. This would encroach on existing properties and farmland. 5. Is this why Indurent are already carrying out explorative test holes over the days of 15th-17th Dec ? 6. what exactly is emergency access - when the A500 is busy/congested which happens every day, especially at peak times, will lorries reroute via Park Lane. 7. What is to stop employees or delivery vehicles using Park Lane for their convenience and how would you identify legitimate deliveries to homes along Park Lane ax opposed to AB2 work traffic. 8. clearly its not just the loss of 80 hectares of green belt to the development. Its impact is encroaching further as the quiet country lanes surrounding the site come under stress in order to service AB2 9. would the residents of Audley still want to enjoy using Park and Moat Lane for leisure activities in these circumstances. 10. An independent and in-depth emissions study would also be very welcome. There are residential properties along the perimeter of AB2. The air quality is already affected by the M6 which borders the site. Additional traffic on and off AB2 may have a significant impact on current air quality. In addition the planning proposal includes a lorry park. This will also generate extra vehicle movement entering and exiting AB2. 11. I welcome a micro monitoring and independent, in depth, current traffic analysis. 12. Where projected traffic volumes from the new warehouse site along the Chatterley Valley (currently under construction but yet to be completed) included as well as the anticipated traffic using the proposed AB2 lorry park to produce a realistic model of traffic volumes on the A500.and surrounding area.Current figures put forward seem to be out of date and have not factored in the increase of traffic on the A500/junction 16, M6 once the Chatterley Valley development is completed and up and running. This too was initially agricultural land before becoming another gigantic warehouse site. So traffic volumes will increase from current levels on its completion. 13. There are no bus or train services within miles of the AB2 site. So no alternative to reduce vehicle traffic. The villages of Audley and Bignall End are small, residential settlements with a lot of private cars parked on busy narrow streets and roads . It takes just one vehicle to break down on the A500 for queuing traffic to become extreme. This in turn pushes vehicles travelling East West onto the B5500. Children in the local area have to negotiate this and other roads when travelling between home and school. Any additional traffic in and around the Audley area would be problematic and put strain on an already busy road network. 14. Traffic impact on the area once the development is completed. This is a major issue. Access to the AB2 site is limited because the M6 forms a barrier to the west of the site, the A500 to the north and as mentioned above narrow farm lanes to the south and East. Proposed access at junction 16 of M6 would put additional pressure on an already busy and congested interchange. Long daily tail backs form on the A500 from J16 which stretch back to the Talke interchange and also in the opposite direction when approaching Junction 16 from Crewe and Nantwich. 15. In addition due to existing congestion - drivers seek to quejump by leaving the A500 on the Audley slip road and then immediately rejoining it allows them to leapfrog some of the congestion. I have recently

witnessed traffic turning round on the slip road and driving back up the wrong way trying to avoid joining the stationery que on the A500!!

16. There have been numerous incidents of road traffic collisions at the Audley interchange on the A500. This interchange is pivotal for access to AB2 from a possible option of access to site off the A500 north bound carriageway. The Audley interchange is just a "B" road crossing the A500 completely unsuitable for large vehicles to negotiate or even use on a regular basis. However it is the only means for vehicles to switch from the south bound to the north bound carriageway.

17. The Audley interchange on the A500 is already a notorious accident black spot.

18. If site access to AB2 is via the traffic light controlled roundabout at Junction 16 i envisage this to be extremely costly and very disruptive to road users while the work is undertaken. On completion it will slow the flow of traffic even further. Vehicles using the roundabout will experience even longer delays because the number of entry/exit points will go up from 10 to 12 !

19. a full cost/impact analysis should be undertaken regarding AB2 site access before any final decision is made to add AB2 to the local plan.

20. We have also grave concerns regarding visual and physical impact to the area should the site go ahead.

21. How can bunding and even mature trees fully screen the size of the proposed 'big box' constructions from local residents.

22. Impossible to contain light, noise and waste pollution to the designated 80 hectare footprint of AB2. The area earmarked for warehousing is located in a rural environment so it will inevitably have an impact above and beyond the initial 80 hectare site.

23. A detailed model, together with a thorough visual impact study needs to be completed. For example hard paths between enormous superstructures is no substitute for open fields with 360 far reaching views over the Cheshire plain and Staffs moorlands.

24. There are ridges, hills and slopes all over the 80 hectare site, so how do the developers propose to anchor the warehousing within the topography. Will the very nature of the "lie of the land" be altered.

25. 80 hectares is an extraordinary amount of green belt to be released to commercial usage. Does the benefit outweigh the loss of open pasture land, far reaching views and destruction of habitat.

26. 3500 new jobs, but there are jobs lost as well as revenue in agriculture and associated industries due to farm closures.

On a finale point, i would like to know why Indurent has been granted approval by the highways authority to dig numerous test holes along Park Lane and other narrow lanes surrounding the AB2 site when the overall plan has yet to be approved? I have been unable to ascertain if this work is connected to the monitoring of traffic or an exploration to see if these roads are suitable for the proposed emergency access to AB2 and if not, what work would be required to make them fit for this purpose?

I would welcome careful consideration and due diligence by an independent party in investigating the above concerns before any final decision is reached regarding AB2's addition to the local plan.

Comment ID	64
Response Date	14/12/2025 11:06:00
Consultee Family Name	Darlington
Consultee Given Name	Jennifer
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Dear Planning Inspector,</p> <p>I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>Issues over the proposed release of 80 hectare of green belt land at AB2.</p> <ol style="list-style-type: none"> 1. The developer had applied for Emergency access to site AB2 via Park Lane and or Moat Lane, Barthomley Road. Walkers , horse riders, dog walkers, families on bikes, and runners all use this network of single track lanes around AB2 any increase in traffic will have a great detrimental impact on these activities. 2. Indurent are anticipating 3500 job opportunities on completion of AB2; potentially this could mean an extra 3500 vehicles using the road network several times a day to gain access on and off site. This is infeasible whether constructing a new access point off A500 or via the single track country lanes. 3. Access via Park Lane(a single track width road, hardly more than a farm track, with no pavements, curbs and in some places potholed, just the odd passing place for vehicles to squeeze by one another. Any increase in traffic flow would inevitably result in a daily grid lock making it difficult for residents to leave home especially during peak times. 4. It would clearly necessitate the widening of the said single track Lanes to make them fit for purpose. This would encroach on existing properties and farmland. 5. Is this why Indurent are already carrying out explorative test holes over the days of 15th-17th Dec ? 6. what exactly is emergency access - when the A500 is busy/congested which happens every day, especially at peak times, will lorries reroute via Park Lane. 7. What is to stop employees or delivery vehicles using Park Lane for their convenience and how would you identify legitimate deliveries to homes along Park Lane ax opposed to AB2 work traffic. 8. clearly its not just the loss of 80 hectares of green belt to the development. Its impact is encroaching further as the quiet country lanes surrounding the site come under stress in order to service AB2 9. would the residents of Audley still want to enjoy using Park and Moat Lane for leisure activities in these circumstances. 10. An independent and in-depth emissions study would also be very welcome. There are residential properties along the perimeter of AB2. The air quality is already affected by the M6 which borders the site. Additional traffic on and off AB2 may have a significant impact on current air quality. In addition the planning proposal includes a lorry park. This will also generate extra vehicle movement entering and exiting AB2. 11. I welcome a micro monitoring and independent, in depth, current traffic analysis. 12. Where projected traffic volumes from the new warehouse site along the Chatterley Valley (currently under construction but yet to be completed) included as well as the anticipated traffic using the proposed AB2 lorry park to produce a realistic model of traffic volumes on the A500.and surrounding area.Current figures put forward seem to be out of date and have not factored in the increase of traffic on the A500/junction 16, M6 once the Chatterley Valley development is completed and up and running. This too was initially agricultural land before becoming another gigantic warehouse site. 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witnessed traffic turning round on the slip road and driving back up the wrong way trying to avoid joining the stationery que on the A500!!

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26. 3500 new jobs, but there are jobs lost as well as revenue in agriculture and associated industries due to farm closures.

On a finale point, i would like to know why Indurent has been granted approval by the highways authority to dig numerous test holes along Park Lane and other narrow lanes surrounding the AB2 site when the overall plan has yet to be approved? I have been unable to ascertain if this work is connected to the monitoring of traffic or an exploration to see if these roads are suitable for the proposed emergency access to AB2 and if not, what work would be required to make them fit for this purpose?

I would welcome careful consideration and due diligence by an independent party in investigating the above concerns before any final decision is reached regarding AB2's addition to the local plan.

Comment ID	166
Response Date	17/12/2025 15:40:00
Consultee Company / Organisation	Environment Agency
Consultee Position	Planning Specialist
Consultee Family Name	Davies
Consultee Given Name	Mark
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM108
Q4page - Page	69/70 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	TB23 Land West of Galingale View
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We previously raised/maintained concern (see Statement of Common Ground, EX/SCG/08) regarding the allocation of sites in proximity of Walleys Quarry. Site TB23 / SP23 are of most concern. We note these remain within the plan and text (13.260 extract below) has been amended that suggests that occupation of dwellings will not occur until "operation of Walleys Quarry as a landfill site has ceased" – it is unclear what this means i.e. the importation of non-hazardous waste to Walleys quarry landfill has already ceased. But the operational issues and risks are ongoing and will be for some time into the future. The plan text (13.260) also suggests that by not occupying dwellings until operation has ceased (this) "will mitigate against potential polluting impacts...(and) enable the continued operation of the landfill site" – this text appears confusing?</p> <p>Whilst MM108 (TB23) suggests in the amended criteria 2: "No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the Walleys Quarry Landfill Site".</p> <p>For context, there will be ongoing risk of-</p> <ul style="list-style-type: none"> • Malodour and detriment to quality from normal day to day management of the landfill, including where the incumbent gas contractor captures, collects, and destroys landfill gas (via engine and flare). Unforeseen mechanical breakdown of plant and equipment, or damage to critical pollution control infrastructure (such as the temporary capping and related infrastructure) will increase this risk. There is greater likelihood of damage to temporary capping at Walleys principally due to the high rates of waste settlement. • Experiencing amenity and air quality impacts particularly during spells of cooler, low windspeed conditions where air dispersion is less. This includes accumulation of background odours, as the site will not be free of odour. • Gas migration that requires further technical assessment, and potential mitigation through building design. • The volume and quality of surface water discharged from the site is variable, with onsite operations and prevalent weather conditions influencing factors- further detailed risk assessments and sustainable drainage provisions are advisable. Extract: 13.260. Dwellings will not be occupied until the operation of Walleys Quarry as a landfill site has ceased. This will mitigate against potential polluting impacts from the landfill site and enable the continued operation of the landfill site. For context- The site does not import waste with potential to cause malodour, but future remedial capping works are likely to involve the excavation and/or reprofiling of waste, with corresponding increase of emissions. This cannot be predicted at this time. • We cannot rule out the site ownership being transferred to another operator, or Environmental Permit being sought to resume waste activities onsite. There is remaining void space and potential to import materials to meet the Minerals Planning Authority requirements for restoration. • Noise emissions from site are likely to be above the ambient background levels and require further detailed assessment. • Further detailed air quality modelling will be required in relation to emissions from the gas engines and flares. • There will be ongoing requirement to manage leachate from site – this will include tankering from storage tanks and occasionally the leachate treatment plant resulting in odorous emissions. • The Environment Agency (EA) are commissioning further work in relation to the sites hydrogeological risk assessment and need to restore ground water management. We cannot at this stage make comment on any related impacts to groundwater levels, connectivity to surface waters, or impacts on quality of flood risks (surrounding water environment). This study is anticipated to take 6 to 12 months to complete. The Planning Authority may wish to consider this more fully for the purpose of any future site allocation/development. We acknowledge the additional text suggesting "assessment including relevant surveys and mitigation strategy is required in relation to the potential impact of landfill on controlled water receptors, landfill gas migration and odours". <p>We can provide the following update:</p> <p>We previously advised that the landfill will continue to generate gas and leachate, which will need to be monitored and managed for many years after closure. The proposed restrictions on occupancy of homes</p>

until the cessation of non- hazardous waste disposal at the quarry, or a latter part of the plan period, does not adequately mitigate the risks.

Whilst, we recognise, the policy refers to Staffordshire Waste Local Plan (adopted 2013) and particularly safeguarding Policy 2.5. this does not consider the impacts upon new residential users in line with the latest NPPF policy – para 187 (e). preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. NPPF Paragraphs 198 and 200 also relevant.

We have included the following text to aid greater understanding and assist decision making.

- The EA are taking discretionary steps under Regulation 57(1) of the Environmental Permitting Regulations to address the risk of serious pollution- not all pollution. The EA does not own the site or responsibility for it and cannot confirm the duration of activity onsite. The EA can only act in respect of its powers. This does not extend to what would be regarded as full site restoration - which is principally a matter for the Planning Authority. We are working with partners in relation to future options for the site but cannot confirm a timescale for this. The suggestion that the landfill will undergo remediation is incorrect, the site will not be remediated and will remain a former landfill, although currently no longer permitted. The future form of the site would be dealt with as a planning matter.
- Odour and air quality impacts will be an ongoing risk. The landfill has significant proportion of temporary capping with 1mm plastic liner, which is vulnerable to defects allowing potential gas egress. Remedial works to maintain this temporary cap has potential to increase odour, although efforts would be made to minimise this as far as practicably possible. It is not possible to anticipate what will be required and when, or the duration of such works. However, it is a continual pattern of monitoring and repairs. Clearly, the risk of odour and other amenity impacts may significantly increase if / or when a decision is taken to develop the landfill site into an acceptable landform.
- The use of temporary capping on landfills is an industry standard, but the Planning Authority should recognise that a number of factors (notably high rate of waste settlement) prompt more frequent cycle of monitoring and repairs. Some defects are complex and cannot be repaired quickly, during which time malodour is more likely.
- As stated above, we cannot rule out the site transferring ownership or third party applying for an Environmental Permit and wishing to resume waste activities.
- It is important to note the site is unlikely to be free of odour even when 'restored' to a planning authorities' direction; with certain weather conditions likely to make background odour more noticeable (e.g. still, cold, damp weather), particularly for receptors in close proximity. The presence of katabatic air flows has historically channelled odour from the site along the valley / brook corridor; so, properties in these areas may have more likelihood of experiencing impacts, but this would require further assessment.
- The proposed development (site TB23, and part of SB23) is very close to the incumbent gas contractors 2MW gas engines and flare on the SE corner of the site. It is foreseeable odour and air quality impacts will be more likely as the effective dilution of exhaust emissions will be less with sensitive receptors in closer proximity. We strongly advise a comprehensive amenity and health impact assessment is undertaken, to inform appropriateness of development. As with all industrial processes, unforeseen mechanical breakdowns can occur – a prolonged and simultaneous failure of gas engines and flare, or inability to collect gas (although both have very low probability), would in reasonable 'worst-case scenario' prompt escalation to consider temporary relocation of residents in close proximity to the site.
- The risk of adverse amenity impacts will persist for many decades because the waste disposed on site will continue to produce landfill gas which includes compounds of a malodourous nature. The gas production will gradually reduce overtime, but each landfill is unique and other factors influence the amount of gas production rates, and how long contractors need to manage this risk.
- We have previously informed you regarding gas migration, which is an ongoing and long-term risk.
- There will be continuous noise from the gas plant compressors, blowers, exhausts, and maintenance activities onsite. This is likely to increase the risk of annoyance particularly at night when background db noise levels reduce.

In summary, we feel that the proposed allocated sites are premature in coming forward given the uncertainty and risks identified above in relation to impact upon future occupiers and environmental emissions/impact upon amenity. In addition to burden on the landfill site owner (including 'agent of change' principle).

Q7 Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As per para 3.47 of our SOCG, we reiterate that - Given the above, we consider it a risk to allocate the site within this plan period. We previously stated that the landfill will continue to generate gas and leachate, which will need to be monitored and managed by the site owners for several years after closure. The current timeframes on when the issues on site can/will be resolved are uncertain. The proposed restrictions on occupancy of homes until the cessation of non- hazardous waste disposal at the quarry, or a latter part of the plan period, does not adequately mitigate the risks.

A further local plan review mechanism could re-assess this as part of a 5-year review, or any new local plan.

Comment ID	158
Response Date	17/12/2025 15:40:00
Consultee Company / Organisation	Environment Agency
Consultee Position	Planning Specialist

Consultee Family Name	Davies
Consultee Given Name	Mark
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM93
Q4page - Page	64 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	SP23 Land at Cemetery Road
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We previously raised/maintained concern (see Statement of Common Ground, EX/SCG/08) regarding the allocation of sites in proximity of Walleys Quarry. Site TB23 / SP23 are of most concern. We note these remain within the plan and text (13.260 extract below) has been amended that suggests that occupation of dwellings will not occur until "operation of Walleys Quarry as a landfill site has ceased" – it is unclear what this means i.e. the importation of non-hazardous waste to Walleys quarry landfill has already ceased. But the operational issues and risks are ongoing and will be for some time into the future. The plan text (13.260) also suggests that by not occupying dwellings until operation has ceased (this) "will mitigate against potential polluting impacts...(and) enable the continued operation of the landfill site" – this text appears confusing?</p> <p>Whilst MM108 (TB23) suggests in the amended criteria 2: "No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the Walleys Quarry Landfill Site".</p> <p>For context, there will be ongoing risk of-</p> <ul style="list-style-type: none"> • Malodour and detriment to quality from normal day to day management of the landfill, including where the incumbent gas contractor captures, collects, and destroys landfill gas (via engine and flare). Unforeseen mechanical breakdown of plant and equipment, or damage to critical pollution control infrastructure (such as the temporary capping and related infrastructure) will increase this risk. There is greater likelihood of damage to temporary capping at Walleys principally due to the high rates of waste settlement. • Experiencing amenity and air quality impacts particularly during spells of cooler, low windspeed conditions where air dispersion is less. This includes accumulation of background odours, as the site will not be free of odour. • Gas migration that requires further technical assessment, and potential mitigation through building design. • The volume and quality of surface water discharged from the site is variable, with onsite operations and prevalent weather conditions influencing factors- further detailed risk assessments and sustainable drainage provisions are advisable. Extract: 13.260. Dwellings will not be occupied until the operation of Walleys Quarry as a landfill site has ceased. This will mitigate against potential polluting impacts from the landfill site and enable the continued operation of the landfill site. 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There is remaining void space and potential to import materials to meet the Minerals Planning Authority requirements for restoration. • Noise emissions from site are likely to be above the ambient background levels and require further detailed assessment. • Further detailed air quality modelling will be required in relation to emissions from the gas engines and flares. • There will be ongoing requirement to manage leachate from site – this will include tankering from storage tanks and occasionally the leachate treatment plant resulting in odourous emissions. • The Environment Agency (EA) are commissioning further work in relation to the sites hydrogeological risk assessment and need to restore ground water management. We cannot at this stage make comment on any related impacts to groundwater levels, connectivity to surface waters, or impacts on quality of flood risks (surrounding water environment). This study is anticipated to take 6 to 12 months to complete. The Planning Authority may wish to consider this more fully for the purpose of any future site allocation/development. We acknowledge the additional text suggesting "assessment including relevant surveys and mitigation strategy is required in relation to the potential impact of landfill on controlled water receptors, landfill gas migration and odours". <p>We can provide the following update:</p> <p>We previously advised that the landfill will continue to generate gas and leachate, which will need to be monitored and managed for many years after closure. The proposed restrictions on occupancy of homes until the cessation of non-hazardous waste disposal at the quarry, or a latter part of the plan period, does not adequately mitigate the risks.</p> <p>Whilst, we recognise, the policy refers to Staffordshire Waste Local Plan (adopted 2013) and particularly safeguarding Policy 2.5. this does not consider the impacts upon new residential users in line with the latest NPPF policy – para 187 (e). preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. NPPF Paragraphs 198 and 200 also relevant.</p> <p>We have included the following text to aid greater understanding and assist decision making.</p>

	<ul style="list-style-type: none"> •The EA are taking discretionary steps under Regulation 57(1) of the Environmental Permitting Regulations to address the risk of serious pollution- not all pollution. The EA does not own the site or responsibility for it and cannot confirm the duration of activity onsite. The EA can only act in respect of its powers. This does not extend to what would be regarded as full site restoration - which is principally a matter for the Planning Authority. We are working with partners in relation to future options for the site but cannot confirm a timescale for this. The suggestion that the landfill will undergo remediation is incorrect, the site will not be remediated and will remain a former landfill, although currently no longer permitted. The future form of the site would be dealt with as a planning matter. •Odour and air quality impacts will be an ongoing risk. The landfill has significant proportion of temporary capping with 1mm plastic liner, which is vulnerable to defects allowing potential gas egress. Remedial works to maintain this temporary cap has potential to increase odour, although efforts would be made to minimise this as far as practicably possible. It is not possible to anticipate what will be required and when, or the duration of such works. However, it is a continual pattern of monitoring and repairs. Clearly, the risk of odour and other amenity impacts may significantly increase if / or when a decision is taken to develop the landfill site into an acceptable landform. •The use of temporary capping on landfills is an industry standard, but the Planning Authority should recognise that a number of factors (notably high rate of waste settlement) prompt more frequent cycle of monitoring and repairs. Some defects are complex and cannot be repaired quickly, during which time malodour is more likely. •As stated above, we cannot rule out the site transferring ownership or third party applying for an Environmental Permit and wishing to resume waste activities. •It is important to note the site is unlikely to be free of odour even when 'restored' to a planning authorities' direction; with certain weather conditions likely to make background odour more noticeable (e.g. still, cold, damp weather), particularly for receptors in close proximity. The presence of katabatic air flows has historically channelled odour from the site along the valley / brook corridor; so, properties in these areas may have more likelihood of experiencing impacts, but this would require further assessment. •The proposed development (site TB23, and part of SB23) is very close to the incumbent gas contractors 2MW gas engines and flare on the SE corner of the site. It is foreseeable odour and air quality impacts will be more likely as the effective dilution of exhaust emissions will be less with sensitive receptors in closer proximity. We strongly advise a comprehensive amenity and health impact assessment is undertaken, to inform appropriateness of development. As with all industrial processes, unforeseen mechanical breakdowns can occur – a prolonged and simultaneous failure of gas engines and flare, or inability to collect gas (although both have very low probability), would in reasonable 'worst-case scenario' prompt escalation to consider temporary relocation of residents in close proximity to the site. •The risk of adverse amenity impacts will persist for many decades because the waste disposed on site will continue to produce landfill gas which includes compounds of a malodorous nature. The gas production will gradually reduce overtime, but each landfill is unique and other factors influence the amount of gas production rates, and how long contractors need to manage this risk. •We have previously informed you regarding gas migration, which is an ongoing and long-term risk. •There will be continuous noise from the gas plant compressors, blowers, exhausts, and maintenance activities onsite. This is likely to increase the risk of annoyance particularly at night when background db noise levels reduce. <p>In summary, we feel that the proposed allocated sites are premature in coming forward given the uncertainty and risks identified above in relation to impact upon future occupiers and environmental emissions/impact upon amenity. In addition to burden on the landfill site owner (including 'agent of change' principle).</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>As per para 3.47 of our SOCG, we reiterate that - Given the above, we consider it a risk to allocate the site within this plan period. We previously stated that the landfill will continue to generate gas and leachate, which will need to be monitored and managed by the site owners for several years after closure. The current timeframes on when the issues on site can/will be resolved are uncertain. The proposed restrictions on occupancy of homes until the cessation of non- hazardous waste disposal at the quarry, or a latter part of the plan period, does not adequately mitigate the risks.</p> <p>A further local plan review mechanism could re-assess this as part of a 5-year review, or any new local plan.</p>
Comment ID	163
Response Date	17/12/2025 15:40:00
Consultee Company / Organisation	Environment Agency
Consultee Position	Planning Specialist
Consultee Family Name	Davies
Consultee Given Name	Mark
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM94

Q4page - Page	65 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	SP23 Land At Cemetery Road Supporting Information
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We previously raised/maintained concern (see Statement of Common Ground, EX/SCG/08) regarding the allocation of sites in proximity of Walleys Quarry. Site TB23 / SP23 are of most concern. We note these remain within the plan and text (13.260 extract below) has been amended that suggests that occupation of dwellings will not occur until “operation of Walleys Quarry as a landfill site has ceased” – it is unclear what this means i.e. the importation of non-hazardous waste to Walleys quarry landfill has already ceased. But the operational issues and risks are ongoing and will be for some time into the future. The plan text (13.260) also suggests that by not occupying dwellings until operation has ceased (this) “will mitigate against potential polluting impacts...(and) enable the continued operation of the landfill site” – this text appears confusing?</p> <p>Whilst MM108 (TB23) suggests in the amended criteria 2: “No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the Walleys Quarry Landfill Site”.</p> <p>For context, there will be ongoing risk of-</p> <ul style="list-style-type: none"> • Malodour and detriment to quality from normal day to day management of the landfill, including where the incumbent gas contractor captures, collects, and destroys landfill gas (via engine and flare). Unforeseen mechanical breakdown of plant and equipment, or damage to critical pollution control infrastructure (such as the temporary capping and related infrastructure) will increase this risk. There is greater likelihood of damage to temporary capping at Walleys principally due to the high rates of waste settlement. • Experiencing amenity and air quality impacts particularly during spells of cooler, low windspeed conditions where air dispersion is less. This includes accumulation of background odours, as the site will not be free of odour. • Gas migration that requires further technical assessment, and potential mitigation through building design. • The volume and quality of surface water discharged from the site is variable, with onsite operations and prevalent weather conditions influencing factors- further detailed risk assessments and sustainable drainage provisions are advisable. Extract: 13.260. Dwellings will not be occupied until the operation of Walleys Quarry as a landfill site has ceased. This will mitigate against potential polluting impacts from the landfill site and enable the continued operation of the landfill site. For context- The site does not import waste with potential to cause malodour, but future remedial capping works are likely to involve the excavation and/or reprofiling of waste, with corresponding increase of emissions. This cannot be predicted at this time. • We cannot rule out the site ownership being transferred to another operator, or Environmental Permit being sought to resume waste activities onsite. There is remaining void space and potential to import materials to meet the Minerals Planning Authority requirements for restoration. • Noise emissions from site are likely to be above the ambient background levels and require further detailed assessment. • Further detailed air quality modelling will be required in relation to emissions from the gas engines and flares. • There will be ongoing requirement to manage leachate from site – this will include tankering from storage tanks and occasionally the leachate treatment plant resulting in odorous emissions. • The Environment Agency (EA) are commissioning further work in relation to the sites hydrogeological risk assessment and need to restore ground water management. We cannot at this stage make comment on any related impacts to groundwater levels, connectivity to surface waters, or impacts on quality of flood risks (surrounding water environment). This study is anticipated to take 6 to 12 months to complete. The Planning Authority may wish to consider this more fully for the purpose of any future site allocation/development. We acknowledge the additional text suggesting “assessment including relevant surveys and mitigation strategy is required in relation to the potential impact of landfill on controlled water receptors, landfill gas migration and odours”. <p>We can provide the following update:</p> <p>We previously advised that the landfill will continue to generate gas and leachate, which will need to be monitored and managed for many years after closure. The proposed restrictions on occupancy of homes until the cessation of non- hazardous waste disposal at the quarry, or a latter part of the plan period, does not adequately mitigate the risks.</p> <p>Whilst, we recognise, the policy refers to Staffordshire Waste Local Plan (adopted 2013) and particularly safeguarding Policy 2.5. this does not consider the impacts upon new residential users in line with the latest NPPF policy – para 187 (e). preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. NPPF Paragraphs 198 and 200 also relevant.</p> <p>We have included the following text to aid greater understanding and assist decision making.</p> <ul style="list-style-type: none"> • The EA are taking discretionary steps under Regulation 57(1) of the Environmental Permitting Regulations to address the risk of serious pollution- not all pollution. The EA does not own the site or responsibility for it and cannot confirm the duration of activity onsite. The EA can only act in respect of its powers. This does not extend to what would be regarded as full site restoration - which is principally a matter for the Planning Authority. We are working with partners in relation to future options for the site but cannot confirm a timescale for this. The suggestion that the landfill will undergo remediation is incorrect, the site will not be remediated and will remain a former landfill, although currently no longer permitted. The future form of the site would be dealt with as a planning matter. • Odour and air quality impacts will be an ongoing risk. The landfill has significant proportion of temporary capping with 1mm plastic liner, which is vulnerable to defects allowing potential gas egress. Remedial

	<p>works to maintain this temporary cap has potential to increase odour, although efforts would be made to minimise this as far as practicably possible. It is not possible to anticipate what will be required and when, or the duration of such works. However, it is a continual pattern of monitoring and repairs. Clearly, the risk of odour and other amenity impacts may significantly increase if / or when a decision is taken to develop the landfill site into an acceptable landform.</p> <ul style="list-style-type: none"> •The use of temporary capping on landfills is an industry standard, but the Planning Authority should recognise that a number of factors (notably high rate of waste settlement) prompt more frequent cycle of monitoring and repairs. Some defects are complex and cannot be repaired quickly, during which time malodour is more likely. •As stated above, we cannot rule out the site transferring ownership or third party applying for an Environmental Permit and wishing to resume waste activities. •It is important to note the site is unlikely to be free of odour even when 'restored' to a planning authorities' direction; with certain weather conditions likely to make background odour more noticeable (e.g. still, cold, damp weather), particularly for receptors in close proximity. The presence of katabatic air flows has historically channelled odour from the site along the valley / brook corridor; so, properties in these areas may have more likelihood of experiencing impacts, but this would require further assessment. •The proposed development (site TB23, and part of SB23) is very close to the incumbent gas contractors 2MW gas engines and flare on the SE corner of the site. It is foreseeable odour and air quality impacts will be more likely as the effective dilution of exhaust emissions will be less with sensitive receptors in closer proximity. We strongly advise a comprehensive amenity and health impact assessment is undertaken, to inform appropriateness of development. As with all industrial processes, unforeseen mechanical breakdowns can occur – a prolonged and simultaneous failure of gas engines and flare, or inability to collect gas (although both have very low probability), would in reasonable 'worst-case scenario' prompt escalation to consider temporary relocation of residents in close proximity to the site. •The risk of adverse amenity impacts will persist for many decades because the waste disposed on site will continue to produce landfill gas which includes compounds of a malodorous nature. The gas production will gradually reduce overtime, but each landfill is unique and other factors influence the amount of gas production rates, and how long contractors need to manage this risk. •We have previously informed you regarding gas migration, which is an ongoing and long-term risk. •There will be continuous noise from the gas plant compressors, blowers, exhausts, and maintenance activities onsite. This is likely to increase the risk of annoyance particularly at night when background db noise levels reduce. <p>In summary, we feel that the proposed allocated sites are premature in coming forward given the uncertainty and risks identified above in relation to impact upon future occupiers and environmental emissions/impact upon amenity. In addition to burden on the landfill site owner (including 'agent of change' principle).</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>As per para 3.47 of our SOCG, we reiterate that - Given the above, we consider it a risk to allocate the site within this plan period. We previously stated that the landfill will continue to generate gas and leachate, which will need to be monitored and managed by the site owners for several years after closure. The current timeframes on when the issues on site can/will be resolved are uncertain. The proposed restrictions on occupancy of homes until the cessation of non- hazardous waste disposal at the quarry, or a latter part of the plan period, does not adequately mitigate the risks.</p> <p>A further local plan review mechanism could re-assess this as part of a 5-year review, or any new local plan.</p>
Comment ID	157
Response Date	17/12/2025 15:40:00
Consultee Company / Organisation	Environment Agency
Consultee Position	Planning Specialist
Consultee Family Name	Davies
Consultee Given Name	Mark
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM11
Q4page - Page	11
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 6 Climate and Renewable Energy
Q4policypara - Policy / Paragraph	CRE1
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No

Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.

Policy CRE1 and supporting text fails to pick up the agreed (see Statement of Common Ground) changes to the water stress classification. Section 6.6 refers to the area being under 'moderate' stress. This does not reflect latest evidence: Water stressed areas – 2021 classification - GOV.UK which identifies the plan areas as being under 'serious' water stress.

We also maintain concern regarding the proposed water efficiency target of 110lts/p/d in line with building regulations and note the latest steer for this to be updated as Building Regulations change. This does not reflect recommendations within the Water Cycle Study

MEN-JBAU-XX-XX-RP-EN-0001-D1-C01-Water_Cycle_Study, issue date 22.7.2024). Section 4.7.3 highlights that Severn Trent Water Limited supply area is defined as being under 'serious' water stress. Recommendations within WCS for mitigating future water stress outlined in Table 4-3 Recommendations for water resources: recommends that policy should require a water efficiency standard of 100l/p/d. Further justification is provided below.

Additional Evidence: The government through the Environmental Improvement Plan 2023 (EIP) is committed to addressing pressures on water supplies and will be reviewing water efficiency standards in the future. As such, we recommend the policy commits and strives towards these future successor standards given the scale and likely timeframes for development across the area. In addition, the NPPF states – '14.Meeting the challenge of climate change, flooding and coastal change:

161. The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change...

Planning for climate change:

162. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply...'

The building regulations sets out 'minimum' standards only which implies it is reasonable for the local plan to go beyond this where justified.

Requirement G2 and Regulations 36 and 37 of the Building Regulations 2010 – Water Efficiency: What water efficiency targets now have to be met? This introduces a minimum water efficiency standard into the Building Regulations for the first time for new homes. It requires that the average water usage of a new home (including those created by a change of use) is no more than 125 litres per person per day or 110 litres/person/day if required as part of the planning permission Estimated water usage must be calculated in accordance with the methodology set out in Appendix A of Approved Document G, unless 'deemed to satisfy' fittings described in Approved Document G are used.

Do I have to follow Approved Document G? No. The Approved Documents provide guidance about compliance with specific aspects of the Building Regulations in some of the more common building situations. There is no obligation to adopt any particular solution contained in the Approved Document if you prefer to meet the relevant requirement in some other way.

https://assets.publishing.service.gov.uk/media/5a81a884e5274a2e8ab552a5/160321_Part_G_FAQ.pdf

We feel that it is reasonable for LPAs to require more stringent standards for water efficiency in new developments than those set in their existing local plan (or in building regulations) should local evidence justify it and if it is feasible and viable. We would draw attention to our previous comments on viability (in our main modification response).

Newcastle Under Lyme is a "seriously water stressed" area (Water stressed areas – 2021 classification - GOV.UK)

Other plans are picking up on this nationally e.g. South Oxfordshire and Vale of White Horse Joint local plan is currently at examination. The publication draft has the following policy. The 'Water Efficiency Topic Paper' that goes with that explains the situation.

Their conclusion being - Given the strong local evidence of, amongst other things, serious water stress in our districts, and in conjunction with the Future Homes Hub recommendations actively advising the government for tighter standards the requirement for of no more than 100 litres per person per day as set out by policy CE7 in the JLP is considered entirely justified. It is further justified by the viability assessment outcomes which demonstrate the costs of achieving this standard still leads to viable schemes.

Other viability considerations

Research suggests that implementing tighter water efficiency standards is generally not costly or challenging and is viable for developments. It should be seen as a positive step.

In terms of viability we would draw attention to the following 'shared standards in water efficiency' document - [shared-standards-in-water-efficiency-for-local-plans.pdf](#) Whilst much of this document covers Anglia region, West Midlands area is also under serious water stress and has water resource challenges and there are key references that will assist your decision making. For instance, please see page 18 and the 'The Future Homes Hub's (FHH) Water Ready report' which was commissioned by Defra to support water efficient homes - [Water Ready_A report to inform HM Government-s roadmap for water efficient new homes.pdf](#)

Table 3 and 4 provide some illustration around the costs associated with inclusion of tighter water efficiency standards. Table 3 (page 18) of that report for example suggests that the costs per dwelling associated with 100 litres/person/day or 90 l/p/d (the report includes data for even lower consumption targets) are not cost prohibitive. Table 4 summarises water fittings for reducing water consumption in relation to cost and performance. These factors shouldn't be seen as a barrier or reason for not requiring sustainable water efficiency targets in your local plan.

The Consumer Council for Water also acknowledges that saving water is not the only driver of water efficiency, it reduces energy bills, water bills of metered customers and carbon emissions.

Our recommendation still stands.

We would therefore maintain our position at this time and recommend the plan is modified in accordance with the above.

References:

Water Efficiency Topic Paper

<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>We recommend that section 6.6 removes the word 'moderate' and replaces it with 'serious' to reflect the latest evidence.</p> <p>We recommend tighter water efficiency standards of 100lts/p/d be adopted in line with the WCS recommendations and other evidence listed above.</p> <p>This is justified by/aligns with evidence base and would make the plan effective.</p>
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Comment ID	99
Response Date	16/12/2025 10:09:00
Consultee Company / Organisation	Thistleberry Residents Association
Consultee Position	Chair
Consultee Family Name	Drakakis-Smith
Consultee Given Name	Angela
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM95
Q4page - Page	65 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Site G&T 8 'Land West of Silverdale Business Park'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<ol style="list-style-type: none"> 1 There now appears to be no provision of land for Gypsies and travellers in this plan. Given the amount of land and number of houses being allocated to the rest of the local population, this would appear to be a disproportionate allocation and might be tantamount to exclusion of this group from the Local Plan. If there is a sound justification for this then it should be heard/explained. 2 Whilst the trajectories for housing provision seem somewhat unrealistic (P188 App 6) – ie overestimates of provision and need, the estimate of need and provision for Gypsies/Travellers appears equally to be not only underestimated but according to this revised plan to be zero. Since this is forward plan re provision, this can hardly be regarded as a sound plan, in my view. 3 This might only be acceptable if the housing provision projected was to include suitable housing on these development sites for Gypsy and Traveller families. If that is not the case then it is likely that this Plan might contravene the law in relation to this protected group. 4 It would thus be interesting to know on what grounds that Newcastle-under-Lyme Borough is exempted from these Laws: the various Race Relations Acts and Guidance, especially the equalities Act of 2010, Crime and Policy Bill 2025. 5 The numerous corrections, and deletions from this Plan, at this late stage, was cause for concern- not least for it soundness as a Plan of intent. 6 It is also a cause of serious concern that this Plan has taken so long to be realised, so many resources and so much public money to bring it to this stage - which appears to be far from completed.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>See above re the necessary compliance with the various relevant Acts and Guidance with regard to provision for Gypsies/Travellers as a protected group. This information has been previously submitted at various stages of this Plan process – but has appears not to have been taken into account.</p> <p>It is difficult to be precise since some data, particularly that with regard to housing need/projections etc., appear either incorrect/ missing ie unsound. See table Page 74 Housing trajectory for the Borough, which shows an over supply of g housing compared with need for the general population. No such trajectory has been displayed for Gypsies and Travellers living next to the Landfill site (within 50 m) since 2007 and before that when the quarry was being excavated. Although much is made re policies for clean air and plans to mitigate dust pollution and other nuisances etc, there is no mention in the plan of rehousing these families to a more conducive site away from the close proximity of the landfill site.</p>

Comment ID	79
Response Date	15/12/2025 16:09:00
Consultee Family Name	Evans
Consultee Given Name	RI
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Right from the initial planning application for this site, I have been unable to see how the volume of traffic currently using the A500/M6 junction16 would not be adversely affected by the increased traffic generated by accessing a proposed Industrial Development in this location. Having spent many days queueing all the way from the Audley/Alsager A500 slip road trying to get on the M6 at junction16, I could not comprehend how no one else could see that the present road network was not coping without having any additional traffic and restrictions to contend with. I therefore applaud the Planning Inspector for identifying the need to look much closer at the two Strategic Transport Assessments that have been submitted to support this proposed development as the figures used in both reports are flawed. The 'base line figures' in the SWECO STA submitted on behalf of NUBLC and the Indurent STA for traffic flow were taken from a traffic census back in 2022 and these are between 40% and 48% lower than todays figures seen on the National Highways counter TRIS 7540/1 during August 2025. The purpose of these STA reports was to show the proposed effect of the AB2 Development on the traffic flow in 2040 but the figures measured in 2025 are already higher than these.</p> <p>I therefore trust that the Micro-simulation transport modelling required by the Planning Inspector will take the above comments into consideration as they can be supported by documentation.</p> <p>I am also very concerned about the proposed use of local single carriageway roads for "Emergency Access" to the proposed site, eg Moat Lane/Barthomley Road/Park Lane, has this been really thought through? I use these roads regularly, am a HGV driver and would not like to be faced with meeting any other vehicles on these roads whilst trying to attend an Emergency. There are many tight bends, soft verges and tractor-trailer combinations using these roads and it would only require one simple mistake to block the access completely, I therefore consider this proposal not sound.</p>

Comment ID	10
Response Date	24/11/2025 16:27:00
Consultee Family Name	Fairey
Consultee Given Name	William
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM104
Q4page - Page	68 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	TK27 Land at Coppice Road
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Unfortunately I cannot fit this response onto your standard template</p> <p>Dear Newcastle Under Lyme Planning Department,</p> <p>I am writing to comment on the local area plan regarding Talke ward, Talke and Talke Pits was within the Neighbourhood Centres and Key Villages – settlement hierarchy, without explanation this category has now been removed. The description for this was to provide a local role in service provision consisting of a parade of shops. These areas are unlikely to have specific growth targets but their retail function should be protected to serve the local population reducing the need for people to travel to reach essential services and facilities.</p> <p>Your research states 'Talke only contains a smaller neighbourhood level centre to serve residents. Large scale development at this location, particularly for a combination of sites could be problematic, both in terms of the ability to mitigate transport impact on the A34 junction with the A500 and on the landscape impact and openness of the Green Belt'.</p> <p>Talke Pits remains a small village with a mix of historical buildings and modern developments. The area's history and heritage still play a role in shaping its identity, and efforts are made to preserve and promote its cultural significance.</p> <p>To suit your planning needs you have moved the ward without good and sound legal context to part of the Urban Centre of Kidsgrove, this area is not part of the Urban area of Kidsgrove and suggesting this is not justified by your research and is against national planning policy.</p> <p>Talke and Talke Pits does not have sufficient infrastructure as outlined by your previous research. As already identified in council planning documents – 'issues and strategic options'</p> <ul style="list-style-type: none"> – Talke and Talke Pits only contains a smaller neighbourhood level centre to serve residents. Large scale development at this location, particularly for a combination of sites could be problematic, both in terms of the ability to mitigate transport impact on the A34 junction with the A500 and on the landscape impact and openness of the Green Belt. – Potential heritage implications including a Conservation Area – The A34 Talke Junction with the A500 already has capacity constraints and development in this area could exacerbate this without appropriate mitigation. – Sites likely to be highly contaminated due to former industrial uses which could affect viability – Kidsgrove has known issues with the capacity of the sewer network. Areas that have seen the highest occurrences of sewer flooding are the most densely populated, in particular Kidsgrove, Talke, Audley and Bignall End <p>Due to the above the plan is nor effective as there are many areas needing addressing to be at a point to construct new dwellings – increasing infrastructure, solving current problems with traffic and access and heritage of the sites which will need thorough assessment and mitigation.</p> <p>Yet current proposals include plans for dwellings within TK+BL Sites of 520 dwellings and CT1 530 dwellings, located in Talke Ward or on direct border of the Kidsgrove plan for 900 dwellings!.</p> <p>Given as above Talke is a key village it is unlikely to serve these extra dwellings. Review your sites within this area. Why have you not planned to deliver housing in the urban centre with amenities and infrastructure of a town already. Instead your plan overloads an already overloaded infrastructure area. You seemed to of ignored your own research as below – this is not an area to place expansion.</p> <p>Green Belt release for development of strategic sites – Talke and Chesterton expansion Option 3 has not been progressed due to concerns over delivering sustainable patterns of development by focusing significant growth in one area of the Borough. It is also acknowledged that there are potential impacts on Green Belt land and strategic transport implications of significant growth along the A500 / A34 Talke roundabout junction. There R19 SA of the Newcastle-under-Lyme Local Plan – Appendix D: Growth Options July 2024 LC-1009_R19_SA_Appendix D_Growth Options_21_250724LB.docx © Lepus Consulting for Newcastle-under-Lyme Borough Council D27 Growth direction options Reason for selection / rejection are also potential heritage concerns with impacts on Wedgewood Monument (Grade II listed) and Talke also has a Conservation Area. There are also concerns relating to the deliverability of this option given multiple land ownerships and contamination concerns due to former industrial uses.</p> <p>Including CT1, a planned large development which will also impact the village that includes a further 530 dwellings. Adding 945 dwellings to Talke village area with high traffic already from commercial large shopping centre (affinity staffordshire) as well as vicinity of major routes A34/A500. This is not in line with the settlement hierarchy. Identified in your research. This will need better investment than referring to use monies from development to improve a junction past the traffic problems.</p> <p>Area – Character – History – Nature</p> <p>Increased risk of urbanisation of the countryside and coalescence</p>

The proposed development at 19 allocated sites were identified as being likely to result in adverse impacts associated with the urbanisation of the countryside, with new development extending settlement boundaries into the open countryside. The development at seven allocated sites could potentially lead to coalescence between settlements: CT1 (coalescence between Talke and Red Street), CH3 (Cross Heath and May Bank), KL13, KL15, SP11 (2), SP11 (3) and TB19 (Newcastle-under-Lyme, Silverdale and Keele). The risk of urban sprawl and coalescence between settlements has potential to reduce separation between settlements and result in loss of local identity and sense of place.

Local environment, such as habitat destruction, loss of green spaces, and disruption of wildlife – proposals include development on much of the green belt of a rural village

Talke contains large green belt sites with a conservation boundary, as well as historic sites, such as Wedgewood monument, Roman road from Chesterton to Chester, Ancient woodland, Listed characterful buildings on Coal Pit Hill and historic coaching inns which are amenities for the local population.

Visual Impact: Aesthetic concerns related to the visual impact of the construction site on the landscape and scenic beauty of the area and the village heritage – a historic village since Stone Age times – containing roman route and coaching route through history (Jamage Road up through Coalpit Hill).

Cultural and Historical Heritage of the village such as Wedgewood monument, Roman road from Chesterton to Chester, Ancient woodland, Listed characterful buildings on Coal Pit Hill and historic coaching inns which are amenities for the local population.

Rural landscapes are typically tranquil, a valuable attribute that once lost is often irreversible. Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban. Increased light pollution levels and consequent impacts on dark skies may arise as a consequence of the development proposed in the Plan. The introduction of both noise and night-time lighting is likely to reduce tranquility within the ward. All developments within Talke are on Green land which adds to the tranquility and culture of the area.

Within Talke and Butt Lane Ward the council have allowed new developments which are still unfinished with raised manholes, lacking pavements, worsened sewerage, further flooding problems and increased traffic. There is no trust that the council can manage developers to ensure that developments have been managed properly and as agreed in planning documents. Talke village specifically is still awaiting the development of a new park which was promised from the loss of community infrastructure.

Health

Further infrastructure will be needed for an increase of up to 4000 population increase. Almost 100% increase in the current local GP population. This should be built and accounted for before further strain is created on local population.

This area has one of the highest number of patients per GP so given the above also services are already stretched and offering finance to the local PCN will not be able to equip them with more GPs given the national shortage. Workload is already deemed unfeasible by the local medical committee and the plans do not address meeting these despite increasing the local population dramatically.

This needs to be addressed within your plans appropriately given the inequality to our local Health already without adding to the extra population.

Your health research has identified the ward has Highest Obesity prevalence in the borough but target to remove more green spaces and playing fields (BL18). The village has no links to cycle lanes, greenways or other health initiatives – in your plans this has been ignored. The above also has a large effect on the current infrastructure given medial resources within the vicinity of the ward are very stretched (see BMA publications and North Staffordshire LMC publications).

Table 3: Year 6 prevalence of obesity by ward in NUL (2019/20 - 2022/23), using data from the Office for Health Improvement and Disparities Ward 2019/20 to 2021/22 2020/21 to 2022/23

Talke & Butt Lane 27.3% Borough Ave 24% UK 22.6%

This area also suffers from high levels of respiratory disease such as COPD 3.2% prevalence vs National average of 1.8%. Again this creates further strain on healthcare resources – let alone the effect that an increase in CO2 and micro-particulates will have on lung health within this small area.

Air Quality: Potential emissions and dust from construction activities that could affect air quality and residents' health. As a village with an elderly population of an ex mining population with high incidences of both Asthma and COPD, air quality is vital to our health. There is also a very large risk and legal liability from opening potential contaminated land (you have already identified many of these sites have a high contamination level). The local population is already seeing increasing cancer rates (higher than local and national averages). Opening contaminated sites and increasing air pollution through microparticulate matter will further drive these levels.

Impact on Water Resources: Concerns about the potential contamination of groundwater or surface water due to construction on previous mining operations.

Sewerage – current infrastructure is struggling to cope and will not cope with extra dwellings – review current infrastructure problems.

Concerns about the health and safety risks associated with construction operations with a high elderly population and nearby residents including the impact on Primary school and amenities.

Community Well-being and mental health from the impact of the lack of infrastructure of a small village to accommodate increases in dwellings (lack of local amenities, school places and small family medical practice) which will cause worries about the overall well-being of the local community and how the construction projects might affect their quality of life., especially given the village has a high elderly population.

Noise Pollution: Noise generated from operations that could disturb the peace and tranquility of the surrounding area changing the character of the ward village/neighbourhood centres and worsening mental health and Wellbeing.

Traffic

Traffic Congestion: An increase in heavy vehicles and traffic associated with mining activities, leading to congestion and potential safety hazards. All mentioned already in your planning analysis Strategic options and Issues. As well as this Peacock Hay road will be much busier once Warehousing and Industrial site is completed from the expected high traffic for workers, visitors and HGV, LGV traffic to the area.

As identified through the national traffic audits the A34 and A500 are already at almost full capacity (>18,000 vehicles daily) with higher impact during M6 closures and delays which are frequent. In your planning you have not included a feasibility of the increase in traffic which will be caused by your development of Chatterley Valley with multiple warehouses being built and road access back to Talke Roundabout.

Traffic and Pollution. Making the assumption that each house will have 1 car at a minimum that is an extra 778 cars on the roads around the ward area. This will produce on average 3600 metric tonnes of CO2 per year minimum, there is no identification within the plans of what carbon offsetting you will do in the local area to mitigate this as well as what you will do to mitigate the impact of CO2 from construction to reduce the impact on local Health.

Road access is at a premium. The proposal is an access point on the A34. This will create more congestion on this already busy road northbound at peak times. Southbound commuters will need to use the local Red Street roads such as Bells Hollow (single track), Talke Road and Liverpool Road. These roads are already extremely busy.

Specifically on TK10

You have already identified this site makes a 'strong contribution to Green Belt purposes'. You have stated 'It would not represent unrestricted sprawl' – you need to check this statement as you are building 170 dwellings on greenbelt sprawling out from the village centre changing the village boundary – this is unrestricted sprawl as will be seen from an aerial map – there are no dwellings in this vicinity on three of the four sides of development.

As outlined in your sustainability plan – 'Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt with detrimentally undermine this purpose"

The site is also not effective as you are suggesting houses for alongside a commercial and industrial district.

The site you have identified already has 'Development high risk areas on site' and the site is in a coal authority high risk area.

Talke and Talke Pits does not have sufficient infrastructure as outlined by your previous research. The traffic for these dwellings would add to the current high volume traffic on Pit Lane to Affinity Staffordshire and Talke Industrial area including a few high volume delivery hubs, merchant sites. This traffic will adversely affect the local area, businesses and commercial shopping outlet due to traffic. The traffic across the village is already too high and has resulted in many speed and traffic reduction strategies. It is also a 'cut through' village when the road network fails – e.g. traffic monitoring surveys when the M6 is congested/closed.

Planned 170 dwellings would mean anything from 170 to 400 extra vehicles on the road with Affinity Staffordshire, industrial and other commercial centres and add to already congested village routes. The proposed development would be adjacent to the Conservation Boundary of Talke and may damage the delicate wildlife corridor with conservation area and footpaths for local residents. Has this been explored by the local wildlife groups and owners of the conservation area?

The development would remove further green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

The proposed development would also interfere with listed building sites on Swan Bank/Coalpit Hill, historic church access as well as land concerns from its mining past (contaminated land) and mining disasters. Number of Listed Buildings within 250m: 6 Number of Listed Buildings within 500m: 6

This proposal would change the character of a small village and will be affecting two areas of conservation and character - Talke Conservation Area adjoins the north-eastern boundary.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.

The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's to 000s of extra dwellings.

This development adding an extra 170 dwelling would impact surface water drainage problems and local water contaminations with mine shafts extending to the area as well as potential water pollution affecting the protected conservation area in Talke

This area is also mixed into an industrial and commercial zone including LGV, HGV traffic, this would harm the current strategic layout of the zone.

Change in views from public rights of way

The development proposed in the Plan has the potential to adversely affect informal high-quality viewing experiences that can be gained from the local PRoW network around proposed development locations. A total of 19 allocated sites coincide with, lie adjacent or lie in close proximity to, PRoW where there is potential for views to be altered

Regarding TK17

The traffic for these dwellings would add to the current high volume traffic on St Martins Road. The traffic in the village is already too high and has resulted in many speed and traffic reduction strategies. There is also a school zone within close proximity.

Planned 40 dwellings would mean anything from 40 to 80 extra vehicles on the road to already congested village routes, where a speed awareness sign has recently been installed due to the safety impact of the traffic. This will highly affect residents trying to walk to amenities or cross the busy high street to access the local stores, doctors and public conveniences. As well as impacting on the traffic and bus route to High Street junction.

Development would remove further Green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both

	<p>during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.</p> <p>The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's of extra dwellings.</p> <p>This development adding an extra 40 dwelling would impact surface water drainage problems and local water contaminations as well as potential water pollution. The high street road to the village is already affected badly by surface and storm water with drainage unable to cope. Further development would impact this severely.</p> <p>This proposal would change the character of a small village and the elderly residential zone (including bungalow character of St Martins Road).</p> <p>Regarding TK27</p> <p>The traffic for these dwelling would add to the current high volume traffic on Coppice Road. The traffic in the village is already too high and has resulted in many speed and traffic reduction strategies.</p> <p>Planned 90 dwellings would mean anything from 90 to 180 extra vehicles on the road to already congested village routes. This will highly affect residents trying to walk to amenities or cross the busy road at the junction with Swan Bank to access the local stores, doctors and public conveniences. As well as impacting on the traffic and bus route.</p> <p>Development would remove further Green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.</p> <p>This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.</p> <p>The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's of extra dwellings.</p> <p>This development adding an extra 90 dwelling would impact surface water drainage problems and local water contaminations as well as potential water pollution. The road to is already affected badly by surface and storm water with the descent to the A50 with drainage unable to cope. Further development would impact this severely.</p> <p>This proposal would change the character of a small village and the elderly residential zone.</p>
Comment ID	7
Response Date	24/11/2025 16:27:00
Consultee Family Name	Fairey
Consultee Given Name	William
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM73
Q4page - Page	52 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	CT1 Land at Red Street
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Unfortunately I cannot fit this response onto your standard template</p> <p>Dear Newcastle Under Lyme Planning Department,</p> <p>I am writing to comment on the local area plan regarding Talke ward,</p> <p>Talke and Talke Pits was within the Neighbourhood Centres and Key Villages – settlement hierarchy, without explanation this category has now been removed. The description for this was to provide a local role in service provision consisting of a parade of shops. These areas are unlikely to have specific growth targets but their retail function should be protected to serve the local population reducing the need for people to travel to reach essential services and facilities.</p> <p>Your research states 'Talke only contains a smaller neighbourhood level centre to serve residents. Large scale development at this location, particularly for a combination of sites could be problematic, both in terms of the ability to mitigate transport impact on the A34 junction with the A500 and on the landscape impact and openness of the Green Belt'.</p> <p>Talke Pits remains a small village with a mix of historical buildings and modern developments. The area's history and heritage still play a role in shaping its identity, and efforts are made to preserve and promote its cultural significance.</p> <p>To suit your planning needs you have moved the ward without good and sound legal context to part of the Urban Centre of Kidsgrove, this area is not part of the Urban area of Kidsgrove and suggesting this is not justified by your research and is against national planning policy.</p> <p>Talke and Talke Pits does not have sufficient infrastructure as outlined by your previous research.</p> <p>As already identified in council planning documents – 'issues and strategic options'</p> <ul style="list-style-type: none"> – Talke and Talke Pits only contains a smaller neighbourhood level centre to serve residents. Large scale development at this location, particularly for a combination of sites could be problematic, both in terms of the ability to mitigate transport impact on the A34 junction with the A500 and on the landscape impact and openness of the Green Belt. – Potential heritage implications including a Conservation Area – The A34 Talke Junction with the A500 already has capacity constraints and development in this area could exacerbate this without appropriate mitigation.

– Sites likely to be highly contaminated due to former industrial uses which could affect viability

– Kidsgrove has known issues with the capacity of the sewer network. Areas that have seen the highest occurrences of sewer flooding are the most densely populated, in particular Kidsgrove, Talke, Audley and Bignall End

Due to the above the plan is not effective as there are many areas needing addressing to be at a point to construct new dwellings – increasing infrastructure, solving current problems with traffic and access and heritage of the sites which will need thorough assessment and mitigation.

Yet current proposals include plans for dwellings within TK+BL Sites of 520 dwellings and CT1 530 dwellings, located in Talke Ward or on direct border of the Kidsgrove plan for 900 dwellings!.

Given as above Talke is a key village it is unlikely to serve these extra dwellings. Review your sites within this area. Why have you not planned to deliver housing in the urban centre with amenities and infrastructure of a town already. Instead your plan overloads an already overloaded infrastructure area. You seemed to have ignored your own research as below – this is not an area to place expansion.

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Including CT1, a planned large development which will also impact the village that includes a further 530 dwellings. Adding 945 dwellings to Talke village area with high traffic already from commercial large shopping centre (affinity staffordshire) as well as vicinity of major routes A34/A500. This is not in line with the settlement hierarchy. Identified in your research. This will need better investment than referring to use monies from development to improve a junction past the traffic problems.

Area – Character – History – Nature

Increased risk of urbanisation of the countryside and coalescence

The proposed development at 19 allocated sites were identified as being likely to result in adverse impacts associated with the urbanisation of the countryside, with new development extending settlement boundaries into the open countryside. The development at seven allocated sites could potentially lead to coalescence between settlements: CT1 (coalescence between Talke and Red Street), CH3 (Cross Heath and May Bank), KL13, KL15, SP11 (2), SP11 (3) and TB19 (Newcastle-under-Lyme, Silverdale and Keele). The risk of urban sprawl and coalescence between settlements has potential to reduce separation between settlements and result in loss of local identity and sense of place.

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Health

Further infrastructure will be needed for an increase of up to 4000 population increase. Almost 100% increase in the current local GP population. This should be built and accounted for before further strain is created on local population.

This area has one of the highest number of patients per GP so given the above also services are already stretched and offering finance to the local PCN will not be able to equip them with more GPs given the national shortage. Workload is already deemed unfeasible by the local medical committee and the plans do not address meeting these despite increasing the local population dramatically.

This needs to be addressed within your plans appropriately given the inequality to our local Health already without adding to the extra population.

Your health research has identified the ward has Highest Obesity prevalence in the borough but target to remove more green spaces and playing fields (BL18). The village has no links to cycle lanes, greenways or other health initiatives – in your plans this has been ignored. The above also has a large effect on the current infrastructure given medial resources within the vicinity of the ward are very stretched (see BMA publications and North Staffordshire LMC publications).

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This area also suffers from high levels of respiratory disease such as COPD 3.2% prevalence vs National average of 1.8%. Again this creates further strain on healthcare resources – let alone the effect that an increase in CO2 and micro-particulates will have on lung health within this small area.

Air Quality: Potential emissions and dust from construction activities that could affect air quality and residents' health. As a village with an elderly population of an ex mining population with high incidences of both Asthma and COPD, air quality is vital to our health. There is also a very large risk and legal liability from opening potential contaminated land (you have already identified many of these sites have a high contamination level). The local population is already seeing increasing cancer rates (higher than local and national averages). Opening contaminated sites and increasing air pollution through microparticulate matter will further drive these levels.

Impact on Water Resources: Concerns about the potential contamination of groundwater or surface water due to construction on previous mining operations.

Sewerage – current infrastructure is struggling to cope and will not cope with extra dwellings – review current infrastructure problems.

Concerns about the health and safety risks associated with construction operations with a high elderly population and nearby residents including the impact on Primary school and amenities.

Community Well-being and mental health from the impact of the lack of infrastructure of a small village to accommodate increases in dwellings (lack of local amenities, school places and small family medical practice) which will cause worries about the overall well-being of the local community and how the construction projects might affect their quality of life., especially given the village has a high elderly population.

Noise Pollution: Noise generated from operations that could disturb the peace and tranquility of the surrounding area changing the character of the ward village/neighbourhood centres and worsening mental health and Wellbeing.

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Traffic Congestion: An increase in heavy vehicles and traffic associated with mining activities, leading to congestion and potential safety hazards. All mentioned already in your planning analysis Strategic options and Issues. As well as this Peacock Hay road will be much busier once Warehousing and Industrial site is completed from the expected high traffic for workers, visitors and HGV, LGV traffic to the area.

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Traffic and Pollution. Making the assumption that each house will have 1 car at a minimum that is an extra 778 cars on the roads around the ward area. This will produce on average 3600 metric tonnes of CO2 per year minimum, there is no identification within the plans of what carbon offsetting you will do in the local area to mitigate this as well as what you will do to mitigate the impact of CO2 from construction to reduce the impact on local Health.

Road access is at a premium. The proposal is an access point on the A34. This will create more congestion on this already busy road northbound at peak times. Southbound commuters will need to use the local Red Street roads such as Bells Hollow (single track), Talke Road and Liverpool Road. These roads are already extremely busy.

Specifically on TK10

You have already identified this site makes a 'strong contribution to Green Belt purposes'. You have stated 'It would not represent unrestricted sprawl' – you need to check this statement as you are building 170 dwellings on greenbelt sprawling out from the village centre changing the village boundary – this is unrestricted sprawl as will be seen from an aerial map – there are no dwellings in this vicinity on three of the four sides of development.

As outlined in your sustainability plan – 'Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt with detrimentally undermine this purpose"

The site is also not effective as you are suggesting houses for alongside a commercial and industrial district.

The site you have identified already has 'Development high risk areas on site' and the site is in a coal authority high risk area.

Talke and Talke Pits does not have sufficient infrastructure as outlined by your previous research

The traffic for these dwellings would add to the current high volume traffic on Pit Lane to Affinity Staffordshire and Talke Industrial area including a few high volume delivery hubs, merchant sites. This traffic will adversely affect the local area, businesses and commercial shopping outlet due to traffic.

The traffic across the village is already too high and has resulted in many speed and traffic reduction strategies. It is also a 'cut through' village when the road network fails – e.g. traffic monitoring surveys when the M6 is congested/closed.

Planned 170 dwellings would mean anything from 170 to 400 extra vehicles on the road with Affinity Staffordshire, industrial and other commercial centres and add to already congested village routes.

The proposed development would be adjacent to the Conservation Boundary of Talke and may damage the delicate wildlife corridor with conservation area and footpaths for local residents. Has this been explored by the local wildlife groups and owners of the conservation area?

The development would remove further green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

The proposed development would also interfere with listed building sites on Swan Bank/Coalpit Hill, historic church access as well as land concerns from its mining past (contaminated land) and mining disasters. Number of Listed Buildings within 250m: 6 Number of Listed Buildings within 500m: 6

This proposal would change the character of a small village and will be affecting two areas of conservation and character - Talke Conservation Area adjoins the north-eastern boundary.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.

The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's to 000s of extra dwellings.

This development adding an extra 170 dwelling would impact surface water drainage problems and local water contaminations with mine shafts extending to the area as well as potential water pollution affecting the protected conservation area in Talke

This area is also mixed into an industrial and commercial zone including LGV, HGV traffic, this would harm the current strategic layout of the zone.

Change in views from public rights of way

The development proposed in the Plan has the potential to adversely affect informal high-quality viewing experiences that can be gained from the local PRoW network around proposed development locations. A total of 19 allocated sites coincide with, lie adjacent or lie in close proximity to, PRoW where there is potential for views to be altered

Regarding TK17

The traffic for these dwelling would add to the current high volume traffic on St Martins Road. The traffic in the village is already too high and has resulted in many speed and traffic reduction strategies. There is also a school zone within close proximity.

Planned 40 dwellings would mean anything from 40 to 80 extra vehicles on the road to already congested village routes, where a speed awareness sign has recently been installed due to the safety impact of the traffic. This will highly affect residents trying to walk to amenities or cross the busy high street to access the local stores, doctors and public conveniences. As well as impacting on the traffic and bus route to High Street junction.

Development would remove further Green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.

The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's of extra dwellings.

This development adding an extra 40 dwelling would impact surface water drainage problems and local water contaminations as well as potential water pollution. The high street road to the village is already affected badly by surface and storm water with drainage unable to cope. Further development would impact this severely.

This proposal would change the character of a small village and the elderly residential zone (including bungalow character of St Martins Road).

Regarding TK27

The traffic for these dwelling would add to the current high volume traffic on Coppice Road. The traffic in the village is already too high and has resulted in many speed and traffic reduction strategies.

Planned 90 dwellings would mean anything from 90 to 180 extra vehicles on the road to already congested village routes. This will highly affect residents trying to walk to amenities or cross the busy road at the junction with Swan Bank to access the local stores, doctors and public conveniences. As well as impacting on the traffic and bus route.

Development would remove further Green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.

The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's of extra dwellings.

This development adding an extra 90 dwelling would impact surface water drainage problems and local water contaminations as well as potential water pollution. The road to is already affected badly by surface and storm water with the descent to the A50 with drainage unable to cope. Further development would impact this severely.

This proposal would change the character of a small village and the elderly residential zone.

Comment ID	9
Response Date	24/11/2025 16:27:00
Consultee Family Name	Fairey
Consultee Given Name	William
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM103
Q4page - Page	68 of Modification Schedule

Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	TK17 Land off St Martins Road, Talke
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Unfortunately I cannot fit this response onto your standard template</p> <p>Dear Newcastle Under Lyme Planning Department,</p> <p>I am writing to comment on the local area plan regarding Talke ward, Talke and Talke Pits was within the Neighbourhood Centres and Key Villages – settlement hierarchy, without explanation this category has now been removed. The description for this was to provide a local role in service provision consisting of a parade of shops. These areas are unlikely to have specific growth targets but their retail function should be protected to serve the local population reducing the need for people to travel to reach essential services and facilities.</p> <p>Your research states 'Talke only contains a smaller neighbourhood level centre to serve residents. Large scale development at this location, particularly for a combination of sites could be problematic, both in terms of the ability to mitigate transport impact on the A34 junction with the A500 and on the landscape impact and openness of the Green Belt'.</p> <p>Talke Pits remains a small village with a mix of historical buildings and modern developments. The area's history and heritage still play a role in shaping its identity, and efforts are made to preserve and promote its cultural significance.</p> <p>To suit your planning needs you have moved the ward without good and sound legal context to part of the Urban Centre of Kidsgrove, this area is not part of the Urban area of Kidsgrove and suggesting this is not justified by your research and is against national planning policy.</p> <p>Talke and Talke Pits does not have sufficient infrastructure as outlined by your previous research. As already identified in council planning documents – 'issues and strategic options'</p> <ul style="list-style-type: none"> – Talke and Talke Pits only contains a smaller neighbourhood level centre to serve residents. Large scale development at this location, particularly for a combination of sites could be problematic, both in terms of the ability to mitigate transport impact on the A34 junction with the A500 and on the landscape impact and openness of the Green Belt. – Potential heritage implications including a Conservation Area – The A34 Talke Junction with the A500 already has capacity constraints and development in this area could exacerbate this without appropriate mitigation. – Sites likely to be highly contaminated due to former industrial uses which could affect viability – Kidsgrove has known issues with the capacity of the sewer network. 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You seemed to have ignored your own research as below – this is not an area to place expansion.</p> <p>Green Belt release for development of strategic sites – Talke and Chesterton expansion Option 3 has not been progressed due to concerns over delivering sustainable patterns of development by focusing significant growth in one area of the Borough. It is also acknowledged that there are potential impacts on Green Belt land and strategic transport implications of significant growth along the A500 / A34 Talke roundabout junction. There R19 SA of the Newcastle-under-Lyme Local Plan – Appendix D: Growth Options July 2024 LC-1009_R19_SA_Appendix D_Growth Options_21_250724LB.docx © Lepus Consulting for Newcastle-under-Lyme Borough Council D27 Growth direction options Reason for selection / rejection are also potential heritage concerns with impacts on Wedgewood Monument (Grade II listed) and Talke also has a Conservation Area. There are also concerns relating to the deliverability of this option given multiple land ownerships and contamination concerns due to former industrial uses.</p> <p>Including CT1, a planned large development which will also impact the village that includes a further 530 dwellings. Adding 945 dwellings to Talke village area with high traffic already from commercial large shopping centre (affinity staffordshire) as well as vicinity of major routes A34/A500. This is not in line with the settlement hierarchy. Identified in your research. This will need better investment than referring to use monies from development to improve a junction past the traffic problems.</p> <p>Area – Character – History – Nature</p> <p>Increased risk of urbanisation of the countryside and coalescence</p> <p>The proposed development at 19 allocated sites were identified as being likely to result in adverse impacts associated with the urbanisation of the countryside, with new development extending settlement boundaries into the open countryside. The development at seven allocated sites could potentially lead to coalescence between settlements: CT1 (coalescence between Talke and Red Street), CH3 (Cross Heath and May Bank), KL13, KL15, SP11 (2), SP11 (3) and TB19 (Newcastle-under-Lyme, Silverdale and Keele). The risk of urban sprawl and coalescence between settlements has potential to reduce separation between settlements and result in loss of local identity and sense of place.</p> <p>Local environment, such as habitat destruction, loss of green spaces, and disruption of wildlife – proposals include development on much of the green belt of a rural village</p> <p>Talke contains large green belt sites with a conservation boundary, as well as historic sites, such as Wedgewood monument, Roman road from Chesterton to Chester, Ancient woodland, Listed characterful buildings on Coal Pit Hill and historic coaching inns which are amenities for the local population.</p> <p>Visual Impact: Aesthetic concerns related to the visual impact of the construction site on the landscape and scenic beauty of the area and the village heritage – a historic village since Stone Age times – containing roman route and coaching route through history (Jamage Road up through Coalpit Hill).</p>

Cultural and Historical Heritage of the village such as Wedgewood monument, Roman road from Chesterton to Chester, Ancient woodland, Listed characterful buildings on Coal Pit Hill and historic coaching inns which are amenities for the local population.

Rural landscapes are typically tranquil, a valuable attribute that once lost is often irreversible. Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban. Increased light pollution levels and consequent impacts on dark skies may arise as a consequence of the development proposed in the Plan. The introduction of both noise and night-time lighting is likely to reduce tranquility within the ward. All developments within Talke are on Green land which adds to the tranquility and culture of the area.

Within Talke and Butt Lane Ward the council have allowed new developments which are still unfinished with raised manholes, lacking pavements, worsened sewerage, further flooding problems and increased traffic. There is no trust that the council can manage developers to ensure that developments have been managed properly and as agreed in planning documents. Talke village specifically is still awaiting the development of a new park which was promised from the loss of community infrastructure.

Health

Further infrastructure will be needed for an increase of up to 4000 population increase. Almost 100% increase in the current local GP population. This should be built and accounted for before further strain is created on local population.

This area has one of the highest number of patients per GP so given the above also services are already stretched and offering finance to the local PCN will not be able to equip them with more GPs given the national shortage. Workload is already deemed unfeasible by the local medical committee and the plans do not address meeting these despite increasing the local population dramatically.

This needs to be addressed within your plans appropriately given the inequality to our local Health already without adding to the extra population.

Your health research has identified the ward has Highest Obesity prevalence in the borough but target to remove more green spaces and playing fields (BL18). The village has no links to cycle lanes, greenways or other health initiatives – in your plans this has been ignored. The above also has a large effect on the current infrastructure given medial resources within the vicinity of the ward are very stretched (see BMA publications and North Staffordshire LMC publications).

Table 3: Year 6 prevalence of obesity by ward in NUL (2019/20 - 2022/23), using data from the Office for Health Improvement and Disparities Ward 2019/20 to 2021/22 2020/21 to 2022/23

Talke & Butt Lane 27.3% Borough Ave 24% UK 22.6%

This area also suffers from high levels of respiratory disease such as COPD 3.2% prevalence vs National average of 1.8%. Again this creates further strain on healthcare resources – let alone the effect that an increase in CO2 and micro-particulates will have on lung health within this small area.

Air Quality: Potential emissions and dust from construction activities that could affect air quality and residents' health. As a village with an elderly population of an ex mining population with high incidences of both Asthma and COPD, air quality is vital to our health. There is also a very large risk and legal liability from opening potential contaminated land (you have already identified many of these sites have a high contamination level). The local population is already seeing increasing cancer rates (higher than local and national averages). Opening contaminated sites and increasing air pollution through microparticulate matter will further drive these levels.

Impact on Water Resources: Concerns about the potential contamination of groundwater or surface water due to construction on previous mining operations.

Sewerage – current infrastructure is struggling to cope and will not cope with extra dwellings – review current infrastructure problems.

Concerns about the health and safety risks associated with construction operations with a high elderly population and nearby residents including the impact on Primary school and amenities.

Community Well-being and mental health from the impact of the lack of infrastructure of a small village to accommodate increases in dwellings (lack of local amenities, school places and small family medical practice) which will cause worries about the overall well-being of the local community and how the construction projects might affect their quality of life., especially given the village has a high elderly population.

Noise Pollution: Noise generated from operations that could disturb the peace and tranquility of the surrounding area changing the character of the ward village/neighbourhood centres and worsening mental health and Wellbeing.

Traffic

Traffic Congestion: An increase in heavy vehicles and traffic associated with mining activities, leading to congestion and potential safety hazards. All mentioned already in your planning analysis Strategic options and Issues. As well as this Peacock Hay road will be much busier once Warehousing and Industrial site is completed from the expected high traffic for workers, visitors and HGV, LGV traffic to the area.

As identified through the national traffic audits the A34 and A500 are already at almost full capacity (>18,000 vehicles daily) with higher impact during M6 closures and delays which are frequent.

In your planning you have not included a feasibility of the increase in traffic which will be caused by your development of Chatterley Valley with multiple warehouses being built and road access back to Talke Roundabout.

Traffic and Pollution. Making the assumption that each house will have 1 car at a minimum that is an extra 778 cars on the roads around the ward area. This will produce on average 3600 metric tonnes of CO2 per year minimum, there is no identification within the plans of what carbon offsetting you will do in the local area to mitigate this as well as what you will do to mitigate the impact of CO2 from construction to reduce the impact on local Health.

Road access is at a premium. The proposal is an access point on the A34. This will create more congestion on this already busy road northbound at peak times. Southbound commuters will need to use the local Red Street roads such as Bells Hollow (single track), Talke Road and Liverpool Road. These roads are already extremely busy.

Specifically on TK10

You have already identified this site makes a 'strong contribution to Green Belt purposes'. You have stated 'It would not represent unrestricted sprawl' – you need to check this statement as you are building 170 dwellings on greenbelt sprawling out from the village centre changing the village boundary – this is unrestricted sprawl as will be seen from an aerial map – there are no dwellings in this vicinity on three of the four sides of development.

As outlined in your sustainability plan – 'Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt with detrimentally undermine this purpose"

The site is also not effective as you are suggesting houses for alongside a commercial and industrial district.

The site you have identified already has 'Development high risk areas on site' and the site is in a coal authority high risk area.

Talke and Talke Pits does not have sufficient infrastructure as outlined by your previous research

The traffic for these dwellings would add to the current high volume traffic on Pit Lane to Affinity Staffordshire and Talke Industrial area including a few high volume delivery hubs, merchant sites. This traffic will adversely affect the local area, businesses and commercial shopping outlet due to traffic.

The traffic across the village is already too high and has resulted in many speed and traffic reduction strategies. It is also a 'cut through' village when the road network fails – e.g. traffic monitoring surveys when the M6 is congested/closed.

Planned 170 dwellings would mean anything from 170 to 400 extra vehicles on the road with Affinity Staffordshire, industrial and other commercial centres and add to already congested village routes.

The proposed development would be adjacent to the Conservation Boundary of Talke and may damage the delicate wildlife corridor with conservation area and footpaths for local residents. Has this been explored by the local wildlife groups and owners of the conservation area?

The development would remove further green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

The proposed development would also interfere with listed building sites on Swan Bank/Coalpit Hill, historic church access as well as land concerns from its mining past (contaminated land) and mining disasters. Number of Listed Buildings within 250m: 6 Number of Listed Buildings within 500m: 6

This proposal would change the character of a small village and will be affecting two areas of conservation and character - Talke Conservation Area adjoins the north-eastern boundary.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.

The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's to 000s of extra dwellings.

This development adding an extra 170 dwelling would impact surface water drainage problems and local water contaminations with mine shafts extending to the area as well as potential water pollution affecting the protected conservation area in Talke

This area is also mixed into an industrial and commercial zone including LGV, HGV traffic, this would harm the current strategic layout of the zone.

Change in views from public rights of way

The development proposed in the Plan has the potential to adversely affect informal high-quality viewing experiences that can be gained from the local PRoW network around proposed development locations. A total of 19 allocated sites coincide with, lie adjacent or lie in close proximity to, PRoW where there is potential for views to be altered

Regarding TK17

The traffic for these dwelling would add to the current high volume traffic on St Martins Road. The traffic in the village is already too high and has resulted in many speed and traffic reduction strategies. There is also a school zone within close proximity.

Planned 40 dwellings would mean anything from 40 to 80 extra vehicles on the road to already congested village routes, where a speed awareness sign has recently been installed due to the safety impact of the traffic. This will highly affect residents trying to walk to amenities or cross the busy high street to access the local stores, doctors and public conveniences. As well as impacting on the traffic and bus route to High Street junction.

Development would remove further Green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.

The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's of extra dwellings.

This development adding an extra 40 dwelling would impact surface water drainage problems and local water contaminations as well as potential water pollution. The high street road to the village is already affected badly by surface and storm water with drainage unable to cope. Further development would impact this severely.

This proposal would change the character of a small village and the elderly residential zone (including bungalow character of St Martins Road).

Regarding TK27

The traffic for these dwelling would add to the current high volume traffic on Coppice Road. The traffic in the village is already too high and has resulted in many speed and traffic reduction strategies.

	<p>Planned 90 dwellings would mean anything from 90 to 180 extra vehicles on the road to already congested village routes. This will highly affect residents trying to walk to amenities or cross the busy road at the junction with Swan Bank to access the local stores, doctors and public conveniences. As well as impacting on the traffic and bus route.</p> <p>Development would remove further Green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.</p> <p>This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.</p> <p>The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's of extra dwellings.</p> <p>This development adding an extra 90 dwelling would impact surface water drainage problems and local water contaminations as well as potential water pollution. The road to is already affected badly by surface and storm water with the descent to the A50 with drainage unable to cope. Further development would impact this severely.</p> <p>This proposal would change the character of a small village and the elderly residential zone.</p>
Comment ID	8
Response Date	24/11/2025 16:27:00
Consultee Family Name	Fairey
Consultee Given Name	William
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM101
Q4page - Page	67 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	TK10 Land at Crown Bank
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Area – Character – History – Nature

Increased risk of urbanisation of the countryside and coalescence

The proposed development at 19 allocated sites were identified as being likely to result in adverse impacts associated with the urbanisation of the countryside, with new development extending settlement boundaries into the open countryside. The development at seven allocated sites could potentially lead to coalescence between settlements: CT1 (coalescence between Talke and Red Street), CH3 (Cross Heath and May Bank), KL13, KL15, SP11 (2), SP11 (3) and TB19 (Newcastle-under-Lyme, Silverdale and Keele). The risk of urban sprawl and coalescence between settlements has potential to reduce separation between settlements and result in loss of local identity and sense of place.

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Specifically on TK10

You have already identified this site makes a 'strong contribution to Green Belt purposes'. You have stated 'It would not represent unrestricted sprawl' – you need to check this statement as you are building 170 dwellings on greenbelt sprawling out from the village centre changing the village boundary – this is unrestricted sprawl as will be seen from an aerial map – there are no dwellings in this vicinity on three of the four sides of development.

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This area is also mixed into an industrial and commercial zone including LGV, HGV traffic, this would harm the current strategic layout of the zone.

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Regarding TK17

The traffic for these dwelling would add to the current high volume traffic on St Martins Road. The traffic in the village is already too high and has resulted in many speed and traffic reduction strategies. There is also a school zone within close proximity.

Planned 40 dwellings would mean anything from 40 to 80 extra vehicles on the road to already congested village routes, where a speed awareness sign has recently been installed due to the safety impact of the traffic. This will highly affect residents trying to walk to amenities or cross the busy high street to access the local stores, doctors and public conveniences. As well as impacting on the traffic and bus route to High Street junction.

Development would remove further Green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.

The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's of extra dwellings.

This development adding an extra 40 dwelling would impact surface water drainage problems and local water contaminations as well as potential water pollution. The high street road to the village is already affected badly by surface and storm water with drainage unable to cope. Further development would impact this severely.

This proposal would change the character of a small village and the elderly residential zone (including bungalow character of St Martins Road).

Regarding TK27

The traffic for these dwelling would add to the current high volume traffic on Coppice Road. The traffic in the village is already too high and has resulted in many speed and traffic reduction strategies.

Planned 90 dwellings would mean anything from 90 to 180 extra vehicles on the road to already congested village routes. This will highly affect residents trying to walk to amenities or cross the busy road at the junction with Swan Bank to access the local stores, doctors and public conveniences. As well as impacting on the traffic and bus route.

Development would remove further Green belt surrounding the village added to losses of all the other proposed sites. Impacting community wellbeing and air quality.

This proposal would create extra Air quality problems both during construction and once completed leading to worsen local community well being and health. It would also increase CO2 emissions both during construction and after construction while also reducing green belt which reduce CO2 locally – again with a large impact on health of the residents in the village.

The proposal would put extra pressure on the small infrastructure within the village for residents – as above it is village settlement hierarchy and cannot cope with the large extra pressures of 00's of extra dwellings.

This development adding an extra 90 dwelling would impact surface water drainage problems and local water contaminations as well as potential water pollution. The road to is already affected badly by surface and storm water with the descent to the A50 with drainage unable to cope. Further development would impact this severely.

This proposal would change the character of a small village and the elderly residential zone.

Comment ID	130
Response Date	17/12/2025 07:31:00
Consultee Family Name	Fradley
Consultee Given Name	BJ
Agent Company / Organisation	Mr BJ Fradley
Agent Family Name	Anderson
Agent Given Name	Grant
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM02
Q4page - Page	2-4 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Local Plan Key Diagram (Figure 2)
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This representation in respect of Main Modification MM02 should be read together with the accompanying representations in respect of Main Modifications MM73, MM08 and Policies Map Modification PM01.</p> <p>Please refer to the attach documents comprising:-</p> <ol style="list-style-type: none"> 1. statement on behalf of B.J.Fradley; 2. SLR Technical Note on Remediation Strategy and Associated Costs; 3. Cushman & Wakefield Site Viability Appraisal; 4. Illustrative Masterplan; 5. Expression of Interest from Northstone Development Limited.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the accompanying documentation referred to in section 6 above, the deletion of site CT1 in the Local Plan Key Diagram (Figure 2) should not be made and site CT1 should be retained in the Local Plan Key Diagram (Figure 2).
Attachments	1363853 Hill Dickinson Land at Red Street.pdf 1363853 Hill Dickinson - Technical Memo Remediation.pdf 1363853 Hill Dickinson - Appendix 1 Site Masterplan.pdf 1363853 Hill Dickinson App 2 Comparable Evidence.pdf 1363853 Hill Dickinson App6a TOE.pdf 1363853 Hill Dickinson-App 6b TOE.pdf 1363853 Hill Dickinson- App 4 Abn Cost Est.pdf 1363853 Hill Dickinson Interest Letter, Dec25.pdf 1363853 Hill Dickinson- App 5 Appraisal.pdf 1363853 Hill Dickinson - Illustrative Masterplan.pdf 1363853 Hill Dickinson - Statement behalf of BJ Fradley in respect of the Main Modifications.pdf 1363853 Hill Dickinson - App 3 BCIS Costs.pdf
Comment ID	134
Response Date	17/12/2025 07:31:00
Consultee Family Name	Fradley
Consultee Given Name	BJ
Agent Company / Organisation	Mr BJ Fradley
Agent Family Name	Anderson
Agent Given Name	Grant
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications

Q4ref - MM Reference	MM73
Q4page - Page	52-54 of modifications schedule
Q4policypara - Policy / Paragraph	CT1
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This representation form in respect of Main Modification MM73 should be read together with the accompanying representations in respect of Main Modification MM02, MM08 and the Policies Map Modification PM01.</p> <p>Please refer to the attach documents comprising:-</p> <ol style="list-style-type: none"> 1.statement on behalf of B.J.Fradley; 2.SLR Technical Note on Remediation Strategy and Associated Costs; 3.Cushman & Wakefield Site Viability Appraisal; 4.Illustrative Masterplan; 5. Expression of Interest from Northstone Development Limited.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the documentation referred to in section 6 above, the deletion of Policy CT1 which is proposed in Main Modification MM73 should not be made and the allocation of policy CT1 should be retained in the Local Plan.
Attachments	1363853 Hill Dickinson - App 3 BCIS Costs.pdf 1363853 Hill Dickinson - Statement behalf of BJ Fradley in respect of the Main Modifications.pdf 1363853 Hill Dickinson - Illustrative Masterplan.pdf 1363853 Hill Dickinson- App 5 Appraisal.pdf 1363853 Hill Dickinson Interest Letter, Dec25.pdf 1363853 Hill Dickinson- App 4 Abn Cost Est.pdf 1363853 Hill Dickinson-App 6b TOE.pdf 1363853 Hill Dickinson App6a TOE.pdf 1363853 Hill Dickinson App 2 Comparable Evidence.pdf 1363853 Hill Dickinson - Appendix 1 Site Masterplan.pdf 1363853 Hill Dickinson - Technical Memo Remediation.pdf 1363853 Hill Dickinson Land at Red Street.pdf
Comment ID	132
Response Date	17/12/2025 07:31:00
Consultee Family Name	Fradley
Consultee Given Name	BJ
Agent Company / Organisation	Mr BJ Fradley
Agent Family Name	Anderson
Agent Given Name	Grant
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8-9 of Modification Schedule
Q4policypara - Policy / Paragraph	Policy PSD5 (Green Belt)
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This representation in respect of Main Modification MM08 should be read together with the accompanying representation in respect of Main Modification MM73, MM02 and the Policies Map Modification PM01.</p> <p>Please refer to the attach documents comprising:-</p> <ol style="list-style-type: none"> 1.statement on behalf of B.J.Fradley; 2.SLR Technical Note on Remediation Strategy and Associated Costs; 3.Cushman & Wakefield Site Viability Appraisal; 4.Illustrative Masterplan; 5. Expression of Interest from Northstone Development Limited.

Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the accompanying documentation referred to in section 6 above, the deletion of the reference to Policy CT1 in Policy PSD5 which is proposed in Main Modification MM08 should not be made and reference to policy CT1 in Policy PSD5 should be retained in the Local Plan.
Attachments	1363853 Hill Dickinson - App 3 BCIS Costs.pdf 1363853 Hill Dickinson - Statement behalf of BJ Fradley in respect of the Main Modifications.pdf 1363853 Hill Dickinson - Illustrative Masterplan.pdf 1363853 Hill Dickinson- App 5 Appraisal.pdf 1363853 Hill Dickinson Interest Letter, Dec25.pdf 1363853 Hill Dickinson- App 4 Abn Cost Est.pdf 1363853 Hill Dickinson-App 6b TOE.pdf 1363853 Hill Dickinson App6a TOE.pdf 1363853 Hill Dickinson App 2 Comparable Evidence.pdf 1363853 Hill Dickinson - Appendix 1 Site Masterplan.pdf 1363853 Hill Dickinson - Technical Memo Remediation.pdf 1363853 Hill Dickinson Land at Red Street.pdf
Comment ID	133
Response Date	17/12/2025 07:31:00
Consultee Family Name	Fradley
Consultee Given Name	BJ
Agent Company / Organisation	Mr BJ Fradley
Agent Family Name	Anderson
Agent Given Name	Grant
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps
Q4ref - MM Reference	PM01
Q4page - Page	2
Q4chap - Chapter, Appendix Number or Map Inset	Strategic Centre Map 1
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This representation in respect of Policies Map Modification PM01 should be read together with the accompanying representations in respect of Main Modifications MM73, MM02 and MM08.</p> <p>Please refer to the attach documents comprising:-</p> <ol style="list-style-type: none"> 1. statement on behalf of B.J.Fradley; 2. SLR Technical Note on Remediation Strategy and Associated Costs; 3. Cushman & Wakefield Site Viability Appraisal; 4. Illustrative Masterplan; 5. Expression of Interest from Northstone Development Limited.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	For the reasons set out in the accompanying documentation referred to in section 6 above, the deletion of site CT1 in the Strategic Centre Map (1) of the Policies Maps should not be made and site CT1 should be retained in the Strategic Centre Map (1) of the Local Plan.
Attachments	1363853 Hill Dickinson Land at Red Street.pdf 1363853 Hill Dickinson - Technical Memo Remediation.pdf

1363853 Hill Dickinson - Appendix 1 Site Masterplan.pdf
1363853 Hill Dickinson App 2 Comparable Evidence.pdf
1363853 Hill Dickinson App6a TOE.pdf
1363853 Hill Dickinson-App 6b TOE.pdf
1363853 Hill Dickinson- App 4 Abn Cost Est.pdf
1363853 Hill Dickinson Interest Letter, Dec25.pdf
1363853 Hill Dickinson- App 5 Appraisal.pdf
1363853 Hill Dickinson - Illustrative Masterplan.pdf
1363853 Hill Dickinson - Statement behalf of BJ Fradley in respect of the Main Modifications.pdf
1363853 Hill Dickinson - App 3 BCIS Costs.pdf

Comment ID	34
Response Date	09/12/2025 23:50:00
Consultee Family Name	Gilmour
Consultee Given Name	Jeanette
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM05
Q4page - Page	7 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD3 Distribution of Development
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I strongly support the modifications, specifically MM05, which result in the removal of the following site allocations:</p> <ul style="list-style-type: none"> • AB33 (Land off Park Lane, Audley) • AB12 (Land off Diglake Street) • CT1 (Land South of Alsager Road/Scotia Road) <p>The removal of these sites is justified and necessary for the following reasons:</p> <ul style="list-style-type: none"> • Highway and Infrastructure Pressure: The allocation of these sites, particularly AB33 and AB12, would have imposed unacceptable pressure on local highway infrastructure. As a resident on the B5500 Nantwich Road, I can attest that this road is heavily utilised as a congestion avoidance route for the M6 J16/A500 corridor. The significant increase in traffic is already evident, exacerbated severely during incidents on the M6 or A500. • Local Highway Safety: I draw attention to the alarming accident rate on the Audley/Alsager Bridge area, with 49 reported accidents in the last two years, underscoring the existing stress on the local network. • Protection of Rural Character and Environment: The modifications, which reduce the total housing provision in Audley and Bignall End from 250 to 110 (noting 74 dwellings are already committed or completed since 2020 at New Cross Lane and AB15, plus 3 at Barthomley Road), are essential to protect the rural character of the villages. This also limits the potential for increased air pollution from additional traffic movements near the already constrained A500 and M6 interchange. • The reductions accurately reflect the overwhelming views of local residents.
Comment ID	35
Response Date	09/12/2025 23:50:00
Consultee Family Name	Gilmour
Consultee Given Name	Jeanette
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I maintain a strong and fundamental objection to the continued inclusion of site AB2 (80 hectares of Green Belt land for employment) in the Local Plan. The issues of soundness related to this site are not resolved by proposed Main Modifications MM67 and MM68.</p> <p>A. Exceptional Circumstances and Justification (Unsound)</p> <ul style="list-style-type: none"> • Chatterley Valley (capacity for 1 million sq ft of warehousing). • Radway Green (existing consent for 1–2 million sq ft of warehousing). • Both alternatives are within a five-mile radius of the AB2 site. • Excess Supply: The Borough Council's required minimum provision for employment land is 63 hectares. The existing identified supply, without AB2, already totals 68.94 hectares, thereby exceeding the minimum requirement. • Viable Alternatives: The exceptional circumstances required to justify the release of 80 hectares of Green Belt agricultural land are not met, especially given the presence of established, non-Green Belt alternatives nearby, including: • Conclusion: The proposed allocation of AB2 is demonstrably unjustified, unnecessary, and represents a clear failure of the 'exceptional circumstances' test for Green Belt release. <p>B. Highways Evidence and Access (Unsound and Premature)</p>

	<ul style="list-style-type: none"> • Outdated/Insufficient Data: Serious concerns remain regarding the highways evidence base. It is essential that up-to-date and robust transport assessments are completed and scrutinised <i>before</i> the site's inclusion, not after. • A500 Access Impossibility: The proposed primary access via the A500 is not viable given the chronic and existing congestion at M6 Junction 16/A500. This highly constrained junction cannot physically accommodate the volume of traffic from such a substantial employment site without a major infrastructure overhaul. • Required Infrastructure: To make this site viable, the developer would necessitate significant and costly off-site works, including a grade-separated flyover at M6 J16/A500 and the dualling of the single-track section of the A500 towards Crewe/Nantwich. The current plan is premature as it relies on an unviable access strategy. • Lorry Park Capacity: The planned 200-space HGV park, alongside the main logistics movements, represents a staggering potential increase in Heavy Goods Vehicles (HGVs). If the park is used for short-duration rest periods (e.g., 2-hour respite), it could generate up to 2,400 HGV movements per day on this already congested route, in addition to operational logistics traffic. The evidence supporting the need for a 200-space lorry park must be publicly robust and fully justified. <p>C. Emergency Access and Local Roads (Critical Safety Issue)</p> <ul style="list-style-type: none"> • Barthomley Road Access: The designation of Barthomley Road as an emergency access point is unacceptable without strict controls. This is a narrow, single-track country lane heavily used by pedestrians, cyclists, and equestrians. • Demand for Strict Enforcement: If AB2 proceeds, the access point on Barthomley Road must be strictly enforced as for EMERGENCY VEHICLES ONLY. I urge the Inspector to mandate the use of barriers, CCTV monitoring, and heavy penalty fines to deter any other use, given the significant public safety risk this would pose to the local highway and pedestrian network. <p>D. Landscaping and Environmental Mitigation</p> <ul style="list-style-type: none"> • Should the Inspector deem the site sound, the minimum requirement for 40% landscaping must be applied to deliver maximum ecological and visual benefit. I request that this 40% is developed as a single, large central green space to facilitate effective wildlife migration and to protect the amenity of existing public footpaths that run through the site. This central landscape feature is crucial for mitigating the visual impact of large-scale warehousing. <p>For the reasons stated above, I find the continued inclusion of site AB2 to be premature, unjustified, and insufficiently evidenced. It remains unsound and cannot be included in the Local Plan until the substantial, site-specific issues regarding highway capacity, access, and Green Belt justification are fully and convincingly resolved.</p>
Comment ID	36
Response Date	09/12/2025 23:50:00
Consultee Family Name	Gilmour
Consultee Given Name	Jeanette
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM68
Q4page - Page	47 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13
Q4polycopara - Policy / Paragraph	AB2 Supporting information
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I maintain a strong and fundamental objection to the continued inclusion of site AB2 (80 hectares of Green Belt land for employment) in the Local Plan. The issues of soundness related to this site are not resolved by proposed Main Modifications MM67 and MM68.</p> <p>A. Exceptional Circumstances and Justification (Unsound)</p> <ul style="list-style-type: none"> • Chatterley Valley (capacity for 1 million sq ft of warehousing). • Radway Green (existing consent for 1–2 million sq ft of warehousing). • Both alternatives are within a five-mile radius of the AB2 site. • Excess Supply: The Borough Council's required minimum provision for employment land is 63 hectares. The existing identified supply, without AB2, already totals 68.94 hectares, thereby exceeding the minimum requirement. • Viable Alternatives: The exceptional circumstances required to justify the release of 80 hectares of Green Belt agricultural land are not met, especially given the presence of established, non-Green Belt alternatives nearby, including: • Conclusion: The proposed allocation of AB2 is demonstrably unjustified, unnecessary, and represents a clear failure of the 'exceptional circumstances' test for Green Belt release. <p>B. Highways Evidence and Access (Unsound and Premature)</p> <ul style="list-style-type: none"> • Outdated/Insufficient Data: Serious concerns remain regarding the highways evidence base. It is essential that up-to-date and robust transport assessments are completed and scrutinised <i>before</i> the site's inclusion, not after. • A500 Access Impossibility: The proposed primary access via the A500 is not viable given the chronic and existing congestion at M6 Junction 16/A500. This highly constrained junction

cannot physically accommodate the volume of traffic from such a substantial employment site without a major infrastructure overhaul.

- **Required Infrastructure:** To make this site viable, the developer would necessitate significant and costly off-site works, including a **grade-separated flyover** at M6 J16/A500 and the **dualling of the single-track section of the A500** towards Crewe/Nantwich. The current plan is **premature** as it relies on an unviable access strategy.
- **Lorry Park Capacity:** The planned 200-space HGV park, alongside the main logistics movements, represents a staggering potential increase in Heavy Goods Vehicles (HGVs). If the park is used for short-duration rest periods (e.g., 2-hour respite), it could generate up to **2,400 HGV movements per day** on this already congested route, in addition to operational logistics traffic. The evidence supporting the need for a 200-space lorry park must be publicly robust and fully justified.

C. Emergency Access and Local Roads (Critical Safety Issue)

- **Barthomley Road Access:** The designation of Barthomley Road as an emergency access point is unacceptable without strict controls. This is a narrow, single-track **country lane** heavily used by pedestrians, cyclists, and equestrians.
- **Demand for Strict Enforcement:** If AB2 proceeds, the access point on Barthomley Road **must be strictly enforced** as for **EMERGENCY VEHICLES ONLY**. I urge the Inspector to mandate the use of barriers, CCTV monitoring, and heavy penalty fines to deter any other use, given the significant public safety risk this would pose to the local highway and pedestrian network.

D. Landscaping and Environmental Mitigation

- Should the Inspector deem the site sound, the minimum requirement for **40% landscaping** must be applied to deliver maximum ecological and visual benefit. I request that this 40% is developed as a **single, large central green space** to facilitate effective **wildlife migration** and to protect the amenity of existing public **footpaths** that run through the site. This central landscape feature is crucial for mitigating the visual impact of large-scale warehousing.

For the reasons stated above, I find the continued inclusion of site **AB2** to be **premature, unjustified, and insufficiently evidenced**. It remains **unsound** and cannot be included in the Local Plan until the substantial, site-specific issues regarding highway capacity, access, and Green Belt justification are fully and convincingly resolved.

Comment ID	136
Response Date	16/12/2025 23:18:00
Consultee Company / Organisation	The Rigger
Consultee Position	Director
Consultee Family Name	Gomes
Consultee Given Name	Tamara
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM59
Q4page - Page	42 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4polycypara - Policy / Paragraph	SE12
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The deletion of criteria 3 from Policy SE12 makes the policy less clear, less effective, and inconsistent with national policy, and is therefore unsound.</p> <p>Criteria 3 previously stated:</p> <p><i>"Where significant adverse effects cannot be effectively mitigated, and no acceptable compromise in operations can be reached, planning permission will be refused"</i></p> <p>Removing this wording weakens the certainty needed when dealing with developments located near existing noise-generating uses such as live-music venues. The explicit reference to refusal where mitigation is not possible is important for ensuring the Agent of Change principle is properly upheld.</p> <p>Guidance from the Music Venue Trust (MVT) (The UK's leading authority on the protection of Grassroots Music Venues), emphasises that planning policy must clearly state that permission should not be granted where noise mitigation cannot fully protect future residents without placing unreasonable restrictions on existing cultural premises. Without this clarity, longstanding venues risk conflict with new residential occupiers, leading to potential enforcement pressures or operational restrictions.</p> <p>For these reasons, the modification is not justified, not effective, and not consistent with national policy, and should not be accepted.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The deleted wording should be reinstated in full to ensure the policy remains clear, enforceable, and aligned with the Agent of Change principle.</p> <p>Suggested wording to reinstate:</p> <p><i>"Where significant adverse effects cannot be effectively mitigated, and no acceptable compromise in operations can be reached, planning permission will be refused."</i></p> <p>Reinstating this clause restores essential clarity about how decision-makers should act when mitigation is not achievable. It also ensures the Local Plan remains consistent with national policy, provides certainty for both developers and existing businesses, and protects Newcastle-Under-Lyme's established cultural venues from unmanageable planning conflicts.</p>

Comment ID	138
Response Date	17/12/2025 14:00:00
Consultee Family Name	Grocott
Consultee Given Name	David
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	67
Q4page - Page	46 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 'land at J16'
Q5LegallyCompliant - Legally compliant	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Good Morning all,</p> <p>I have been made aware of various emails and representations , that have been put in especially regarding AB2 from (redacted by admin) and various other residents.</p> <p>Basically , I cannot add anymore to these representations, which are thorough and factual and point out concerns even after modifications.</p> <p>On Monday at Economy and Place Councillor Fear and Head of planning Craig Jordan gave presentation , which we all were happy to accept.</p> <p>On the legal side , NULBC are compliant but still to pass the sound test with inspector.</p> <p>We all know a local plan can protect areas, and stop unwanted increase in housing numbers that could be incurred , so with this in mind would ask serious deliberation on AB2 sight.</p> <p>Although I am not a Ward Councillor for the area , my links with Wood Lane Cricket Club and Halmer End CIC over many years , means I have lots of interest in proceedings and results.</p> <p>I am concerned that due to infrastructure and financial implications , inspector may still ask for more information , when seeing comments from consultation or even more.</p> <p>Lastly, I would like to put on record Thanks to Allan , Craig and all the team for their efforts and hard work over many years.</p> <p>All the best for the festive period.</p>

Comment ID	164
Response Date	17/12/2025 10:25:00
Consultee Family Name	Hansbury
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4polycypara - Policy / Paragraph	Policy PSD5: Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	I also concur with Modification MM08, which removes site CT1 (Land at Red Street and High Carr Farm). This change avoids the significant transport and environmental impacts that would have arisen from the 530 dwellings initially proposed.
Comment ID	167
Response Date	17/12/2025 10:25:00
Consultee Family Name	Hansbury
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM66
Q4page - Page	45 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy SA1: General Requirements
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the keeping in of AB2 in the Plan is premature, unjustified, and insufficiently evidenced.
Comment ID	171
Response Date	17/12/2025 10:25:00
Consultee Family Name	Hansbury
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy AB12 'Land East of Diglake Street'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant	Modification MM69, which removes the allocation of AB12 (Land East of Diglake Street), I fully concur with as the proposed 125 dwellings, would have impressed overwhelming pressure on local infrastructure, highways, and the surrounding Green Belt landscape.

or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	
Comment ID	170
Response Date	17/12/2025 10:25:00
Consultee Family Name	Hansbury
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM68
Q4page - Page	47 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Paragraph 13.6 & 13.19 (supporting information to Policy AB2 'Land at J16 of the M6')
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues and concerns previously identified by the Inspector during examination.
Comment ID	161
Response Date	17/12/2025 10:25:00
Consultee Family Name	Hansbury
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM05
Q4page - Page	7 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4polycypara - Policy / Paragraph	Policy PSD3: Distribution of Development
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	I also agree with Modification MM05, which minimises the total number of houses required for Audley and Bignall End from 250 to 110 dwellings and believe it reflects the removal of these sites and will help to protect the rural character and environmental integrity of the area. I would like to say here though that I would have liked the modifications to go further in removing all proposed housing sites in the Audley area to reflect the views of residents and preserve its rural integrity even more so.
Comment ID	169
Response Date	17/12/2025 10:25:00
Consultee Family Name	Hansbury
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations

Q4policypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I must strongly disagree with continuing the proposals for AB2 (Land at Junction 16 of the M6) within the Local Plan. Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues and concerns previously identified by the Inspector during examination.</p> <p>These concerns remain regarding the scale of the AB2 proposed development, the lack of complete and up-to-date highways evidence, given the info is 5 years plus old, the uncertainty surrounding the execution of the massive project, and the absence of clarity regarding required mitigation, to reduce impacts as far as possible, should such a development indeed begin and, be sustained.</p> <p>I would also definitely suggest and request that a full health impact assessment (HIA), if these plans were to further progress -for AB2 specifically. The local GP health centre, in particularly, Dr.Page, I know, has gathered much evidence available and I would recommend that he is given all opportunities to add to any health impact evidence to support this kind of assessment in your own collection of data and analysis of risks to the local, currently rural, parish of Audley. This information is crucial to be considered, in my opinion and countless others.</p> <p>The modifications introduce a requirement for micro-simulation transport modelling (as part of MM67), which I welcome in principle. However, it is deeply concerning that this modelling is not required to be completed before the Local Plan is adopted. Access to AB2 is highly likely to necessitate a grade-separated flyover, given that every Staffordshire junction on the A500 is grade-separated other than the large roundabout at the M6. A scheme of this scale would involve substantial infrastructure investment, creating significant viability implications that have not yet been tested or published. The transport data currently relied upon is considerably out of date and does not reflect the daily congestion, queueing, and hazards experienced on the A500, its slip roads, or the rural road network through the Audley parish. Without complete and robust transport modelling, it is not possible to consider AB2 sound or deliverable. There have also recently been more houses passed for an applicant named Grant Emery of around 40 houses in the same area, to which we do not know how this will impact any further construction especially of such a grand scale.</p> <p>I must also raise a red flag query regarding the reference to "emergency access" via Moat Lane within the amended policy. MM67 requires clarification on this point, but none has been provided. Any reference to emergency access must clearly state that Moat Lane is to be used strictly for blue-light emergency vehicles only, and not for HGVs, employee vehicles, or diverted traffic in the event that primary access from the A500 becomes unavailable. Without explicit wording in the modification text, the risk of unintended and inappropriate traffic displacement remains high and unacceptable.</p> <p>Moreover, I note that MM67 refers to measures intended to "discourage" the routing of traffic near Black Firs and Craddock's Moss SSSIs. While this is welcome in principle, the modification provides no detail as to what these measures are, how they will operate, or how they will prevent HGVs and commercial traffic from impacting these sensitive ecological sites. Given their importance, such measures must be defined, tested, and presented before the Local Plan is adopted.</p> <p>I welcome the requirement for a landscape and visual impact assessment within MM67; however, I must object strongly to the replacement of the existing large area of open green space between footpaths Audley 9 and Audley 22 with narrow "green corridors". These corridors, enclosed by substantial warehouse buildings, cannot replicate the value of open green space in terms of biodiversity, ancient landscape character, lie of the land, or public amenity. They will not support farmland birds, and all other local wildlife, that rely on open fields for survival, nor will they provide the recreational or environmental quality currently offered by the open landscape. This modification undermines the principle of a landscape-led masterplan and should be revised immediately.</p> <p>Given the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her Final Report and resist progressing any planning applications relating to AB2 until all highways modelling is fully completed and published, all required mitigation (including a Health Impact Assessment), is costed and independently reviewed, viability is reassessed in light of potentially significant infrastructure requirements, and full community and stakeholder consultation has taken place on the finalised evidence. This approach is essential to ensuring the soundness, effectiveness, and deliverability of any future development proposal.</p>

Comment ID	176
Response Date	17/12/2025 11:09:00
Consultee Family Name	Harrison
Consultee Given Name	Melanie
Q4ref - MM Reference	MM67
Q4page - Page	46 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 (land at J16 of M6)
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>To whom it may concern,</p> <p>I am pleased to hear the removal of AB12 Dislike Street (125 houses), AB33 Nantwich Road (55 houses) and CT1 Red Street (530 houses). All of which would have been pressure on our local highways and other infrastructure.</p> <p>AB2 - I am disappointed to see AB2 remains on the Plan even though the Planning Inspector expressed serious concerns about the scale of the development.</p> <p>Whilst the Planning Inspector expressed serious concerns about the scale of the AB2 development at the junction of the A500 and M6, she has given the benefit of the doubt to the Borough Council and, unfortunately, AB2 is still in the Plan. I am disappointed to see AB2 remains on the Plan even though the Planning Inspector expressed serious concerns about the scale of the development. As a resident on (redacted by admin), we feel AB2 would have serious impact on our everyday living and have grave concerns about the safety of the street with the increase in traffic and through road to site. We need to recognise the scale of the current problems and that the traffic figures submitted by the developers are way out of date and, therefore, any projections are severely under-estimated.</p> <p>We welcome and support the need for a micro-simulation model of the impact on our highways (AB2 para7) but feel that, as the access needed is likely to be a flyover (every junction on the A500 in Staffordshire is grade-separated, i.e. on two levels, other than the first ... which is a very large roundabout) the cost of this may impact the viability of the site and, therefore, this should be undertaken BEFORE the Local Plan is adopted.</p> <p>Any mitigation measures need to take the following into account:</p> <p>The need to recognise the scale of the current problems and that the traffic figures submitted by the developers are way out of date and, therefore, any projections are severe under-estimates. Let them know of the problems you experience.</p> <p>The need to define what emergency use of Moat Lane is: It should be limited to emergency vehicles and not HGVs and employee's cars when the A500 access is inoperative. The need to define what emergency use of Moat Lane is - it shouldn't be used for employee's cars or HGVs as an alternative to the A500. This should be emergency vehicles only. Living on (redacted by admin), only 3 houses from Moat Lane causes great concern us, the roads are narrow and already used as a cut through with drivers not taking due care and driving in excess of the speed limit. It would without question be an area that is unsuitable for walking on if the proposals go ahead, with ourselves feeling like we would be in danger simply leaving the driveway. I can't imagine the use of this road will be monitored therefore by allowing the development to go through will also guarantee that this will increase the traffic along local roads. We have invested heavily into our property and purchased the house in 2022 with key elements of the purchase being the rural setting, quietness and safety the location brings, all of which we fear with proposed modifications and outlines in the plan that will greatly affect us, not to mention the potential severe decrease in desirability of the area and directly our house value being within such proximity of the current proposal of AB2.</p> <p>AB2 para 13: The need to state how they will discourage routing of traffic past Black Firs and Craddock's Moss SSSIs. This should be shown BEFORE the Local Plan is adopted to ensure that the measures will genuinely protect these invaluable sites.</p> <p>We support the requirement for a landscape and visual impact assessment (AB2 para 9). Regarding AB2 para 15: PAPG objects to the removal of the large green space between footpaths Audley 9 and 22 and substitution with green corridors: these corridors will not enhance public rights of way (being hemmed in by giant warehouses) and will ensure the loss of farmland birds on this site (they need open fields, not hedge lined footpaths).</p> <p>Given the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her final report and resist progressing any further. As a resident of (redacted by admin), we first hand see the diverse wildlife and ecosystems such as birds of prey, wild birds, bees and insects and other animals that flourish in the rural grounds that will be occupied by AB2 if this was to go ahead.</p> <p>We would also like to see a report on the noise pollution and impact this will have on our location with us being so close to AB2 as we fear this could affect our health and wellbeing.</p>

Comment ID	108
Response Date	16/12/2025 10:30:00
Consultee Company / Organisation	Sustainable Exercise Partnership (StEP)
Consultee Position	director
Consultee Family Name	Hartveld
Consultee Given Name	Adri
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps Main Modifications Sustainability Appraisal / Habitats Regulations Assessment
Q4ref - MM Reference	MM67
Q4page - Page	46
Q4chap - Chapter, Appendix Number or Map Inset	MM02
Q4policypara - Policy / Paragraph	AB2
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The AB2 warehouses proposal is not sound, nor legal because they would cause a lot of environmental damage to the Stoke-on-Trent / Newcastle-under-Lyme conurbation. This employment site is wholly in the wrong location because it is outside our urban area, far away from where people live. These proposals fully contradict our Labour government Planning policy. The AB2 development would also have grave consequences to the prosperity of the businesses and people in our area. Creating 3,000 jobs at a considerable travel distance from where people live is clearly going to increase car traffic. Creating a massive distribution centre and lorry park far out from the Stoke-on-Trent / Newcastle-under-Lyme conurbation is bound to deteriorate the economic development of Stoke with its heavy reliance on distribution and its numerous brownfield sites. It would make finding and maintaining employment for the many people in Stoke-on-Trent much more difficult. Commuting to this "employment site" would be costly, both on the employees' cost of living as well as their health. The amelioration through "Subject to point 13. measures to support travel to / from the development, particularly by sustainable modes, include cycling links into the development, bus routes and demand responsive travel schemes" is not going to work, because it's too far away from where future employees and future customers live.</p> <p>The UK Labour Government's planning policy is designed to decrease urban sprawl in the traditional sense. The fundamental aim of Green Belt policy remains central to planning policy, committed to prioritizing brownfield (previously developed) land and fast-tracking approval for urban brownfield sites, which directs development inward to already built-up areas rather than outward expansion.</p> <p>Existing, more sustainable regional sites are already available. Stoke-on-Trent and Newcastle-under-Lyme together have ample Employment Land for Warehouses for the regional provision. Whilst the minimum requirement of strategic employment land is 63 ha, removing AB2 alone could still leave 68.94 ha. AB2 is clearly not required to meet NuLBC's employment land obligations. If the intent is to support higher-quality regional employment, this could be achieved on existing sites such as Radway Green or Chatterley Valley. The latter, in particular, could accommodate the largest proposed B8 "big box" unit (1 million sq ft) planned for AB2. Either site could operate as a regional business hub in its own right, and together they offer substantial capacity without consuming further greenfield land or imposing severe impacts on local communities.</p> <p>Traffic and Transport Infrastructure Impacts would be greatly damaging and costly. Traffic is one of the most serious unresolved issues with many safety concerns and potholes. An upgrade to Junction 16—likely unavoidable if AB2 proceeds—has been costed at £40–100 million, and given the routine overspend on major road projects, the true figure will probably exceed the upper estimate. Crucially, this does not account for the strain placed on local roads. NuLBC's 2022 traffic modelling projected 2040 levels of congestion, yet those levels are already being reached, without such employment land location as AB2 warehouses. The surrounding rural road network, with narrow routes through villages, simply cannot accommodate the concentrated flow of commuter and HGV traffic associated with warehouse shift-change peaks.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put	<p>Removal of the AB2 Warehouses development.</p> <p>Include quality regional employment provision including warehouses on existing sites such as Radway Green and Chatterley Valley. This would need to be included in both the Local Plan of the City of Stoke-on-Trent, as well as in the modifications of Newcastle-under-Lyme's Local Plan</p>

forward your suggested revised wording of any policy or text. Please be as precise as possible.

Comment ID	13
Response Date	05/12/2025 13:51:00
Consultee Company / Organisation	Indurent Strategic Land
Consultee Position	Senior Planning Manager
Consultee Family Name	Holdstock
Consultee Given Name	Damien
Agent Company / Organisation	Planning Prospects
Agent Position	Agent on Behalf of St Modwen Developments Ltd
Agent Family Name	Barnes
Agent Given Name	Robert
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	67
Q4page - Page	46 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Indurent are supportive of Policy AB2 which is central to the soundness of the Plan. It is important that Policy AB2 is carried forward into the adopted Plan in a manner that supports fully the effective delivery of employment development here which is central to the overall Strategy. Indurent are also generally supportive of the modifications to Policy AB2 proposed through MM67. However, it is considered that some changes to MM67 are needed to ensure soundness.</p> <p>Criterion 7 as proposed includes that mitigation measures for “any” adverse impacts will be required. This is inappropriate; it is onerous and inconsistent with National Policy which refers to significant and severe impacts not “any” adverse impacts however slight they might be. This criterion also refers to a requirement for agreement and consultation with Cheshire East Council. Cheshire East Council are neither the planning nor the highways authority for the site and a policy requirement for their involvement in this manner is inappropriate and not justified. Indurent’s recollection of discussion at the Examination is that the Inspector made a similar observation indicating that Cheshire East Council should not be included in this manner.</p> <p>The same (Cheshire East Council) point is made in relation to criterion 13. There should not be a requirement embodied in the policy to engage with Cheshire East in this manner.</p> <p>Criterion 15 states, “Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site.” This proposed wording would not be effective. The requirement is appropriately for at least 40% of the total site to comprise strategic and on plot landscaping. In practice this will include green corridors, but will not be limited to green corridors, yet the second sentence (“as green corridors”) implies such a limitation. On plot landscaping, as appropriately sought by the first sentence, might not form part of a green corridor. There is an internal inconsistency here that should be remedied.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>In criterion 7 the word “any” in the opening sentence must be replaced by “significant”. In criteria 7 and 13 references to Cheshire East Council must be deleted.</p> <p>Criterion 15 must be amended to read, “Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered through means including green corridors across the site.”</p>

Comment ID	76
Response Date	15/12/2025 22:32:00
Consultee Family Name	Hough
Consultee Given Name	Alison
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 Land at Junction 16
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Unsound There is currently no legal requirement to state the height and size of warehousing Developers are therefore allowed to decide this. Within the local plan modifications there is no reference this.</p> <p>Unsound There is no reference to the visual impact, vehicle movement etc during the construction phase or destruction of wildlife habitats A few saplings will not mitigate this damage alongside light and noise issues</p> <p>Unsound The economic, social and environmental objectives have not been given equal considerations. Demands from the current Government focuses largely on the economic considerations. This should be mentioned within the modifications.</p> <p>Unsound The mention of 3,500 potential jobs does not justify the amount of HGV and pollution and amount of land identified. The modifications should insist that this is made clear</p> <p>Unsound A regional approach to planning would help to mitigate environmental impact. The main modifications should identify this as a significant issue</p> <p>Unsound A micro simulation model is welcomed but the developers should not be allowed to include the outdated traffic figures they included.</p> <p>Unsound Modifications need to include specification for emergency access via Barthomley road. This is a windy, low visibility, narrow lane It has no pavements to help negate the risk to pedestrians and HGV's would increase the risk to horse riders, cyclists and domestic vehicles.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Whilst the points indicated above may have no bearing on legal compliance, more detail is required to make the plan sound.</p> <p>The environmental impact of the proposed development in terms of a substantial increase in traffic, pollution, irreversible destruction of prime agricultural land , loss of habitats and the effect on Audley village cannot be mitigated by the potential employment of 3,500 people.</p> <p>Brownfield land is available and should be considered in more detail (High Carr Business Park, Chatterley Valley)</p> <p>There is an imbalance between the importance of the economic potential of the warehousing and the environmental impact which should be considered in any documents.</p> <p>Modifications need to include visionary initiatives which are 'fit for the future' and not reliant on past predictions. Smaller warehousing where deliveries may be within one mile, use of freight to transport large consignments rather than blocking already congested motorways and feeder roads.</p>

Comment ID	77
Response Date	15/12/2025 22:32:00
Consultee Family Name	Hough
Consultee Given Name	Stephen
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 Land at Junction 16
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Unsound There is currently no legal requirement to state the height and size of warehousing Developers are therefore allowed to decide this. Within the local plan modifications there is no reference this.</p> <p>Unsound There is no reference to the visual impact, vehicle movement etc during the construction phase or destruction of wildlife habitats A few saplings will not mitigate this damage alongside light and noise issues</p> <p>Unsound The economic, social and environmental objectives have not been given equal considerations. Demands from the current Government focuses largely on the economic considerations. This should be mentioned within the modifications.</p> <p>Unsound The mention of 3,500 potential jobs does not justify the amount of HGV and pollution and amount of land identified. The modifications should insist that this is made clear</p> <p>Unsound A regional approach to planning would help to mitigate environmental impact. The main modifications should identify this as a significant issue</p> <p>Unsound A micro simulation model is welcomed but the developers should not be allowed to include the outdated traffic figures they included.</p> <p>Unsound Modifications need to include specification for emergency access via Barthomley road. This is a windy, low visibility, narrow lane It has no pavements to help negate the risk to pedestrians and HGV's would increase the risk to horse riders, cyclists and domestic vehicles.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Whilst the points indicated above may have no bearing on legal compliance, more detail is required to make the plan sound.</p> <p>The environmental impact of the proposed development in terms of a substantial increase in traffic, pollution, irreversible destruction of prime agricultural land , loss of habitats and the effect on Audley village cannot be mitigated by the potential employment of 3,500 people.</p> <p>Brownfield land is available and should be considered in more detail (High Carr Business Park, Chatterley Valley)</p> <p>There is an imbalance between the importance of the economic potential of the warehousing and the environmental impact which should be considered in any documents.</p> <p>Modifications need to include visionary initiatives which are 'fit for the future' and not reliant on past predictions. Smaller warehousing where deliveries may be within one mile, use of freight to transport large consignments rather than blocking already congested motorways and feeder roads.</p>

Comment ID	75
Response Date	15/12/2025 21:02:00
Consultee Family Name	Howell
Consultee Given Name	Emma
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM68 - Policy AB2 (Land at Junction 16, M6)
Q4page - Page	47 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations Policy AB2
Q4policypara - Policy / Paragraph	Policy AB2 - Land at Junction 16 (M6), Main Modifications MM67/MM68
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Conflict with National Planning Policy Framework (NPPF) - Green Belt</p> <p>Policy AB2 is not legally compliant because it conflicts with the NPPF requirements for Green Belt Protection.</p> <p>The NPPF makes clear that:</p> <ul style="list-style-type: none"> Green Belt boundaries should only be altered in exceptional circumstances Inappropriate development in the Green Belt is by definition harmful Substantial weight must be given to any harm to the Green Belt. <p>Policy AB2 proposes large scale warehousing, an inherently urban and industrial use, on land currently designated as Green Belt. The policy fails to demonstrate:</p> <ul style="list-style-type: none"> Exceptional circumstances to justify this loss of Green Belt Why alternative non Green Belt or brownfield sites cannot meet the identified need. <p>The council has failed to demonstrate that reasonable alternatives to Green Belt release have been explored.</p> <p>There are existing vacant and under-utilised warehouse units within neighbouring boroughs, such as Cheshire East, which could accommodate the identified employment need.</p> <p>The NPPF requires Green Belt release to be a last resort and only justified where needs cannot be met elsewhere. Warehousing is a non-location-specific use and is well suited to re-use of existing premises.</p> <p>The council has not demonstrated effective engagement under the Duty to Cooperate, nor explained why existing capacity in adjoining authorities cannot meet the need.</p> <p>Failure to Properly Assess Residential Impacts</p> <ul style="list-style-type: none"> Policy AB2 fails to assess the impact of warehouse development on [redacted by admin] property that would be surrounded on three sides, creating an unacceptable degree of enclosure, visual dominance and loss of outlook. The policy does not address noise impacts associated with warehousing, including 24-hour operations, HGV movements, loading/unloading activity and reversing alarms. Light pollution and security infrastructure including floodlighting, CCTV and perimeter security, would result in constant illumination, loss of privacy and further industrialisation of the residential environment. The dwellings rely on septic tanks discharging into the surrounding land. Policy AB2 fails to assess the impact of development on the continued operation, maintenance and viability of this private drainage system, risking environmental health impacts. The policy fails to assess how extensive hardstanding, building foundations and altered ground levels associated with warehousing would increase surface runoff and exacerbate flood risk. <p>The cumulative impacts have not been assessed. Policy AB2 therefore fails to protect residential amenity and is not legally compliant or sound.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Requested Changes to Policy AB2 to Ensure Legal Compliance and Soundness</p> <p>Change 1: Exclude Development that Surrounds Existing Residential Properties on Multiple Sides</p> <p>Proposed change:</p> <p>Amend Policy AB2 to prohibit warehouse development on land that would surround existing residential properties on two or more sides, and require a substantial undeveloped buffer between industrial uses and existing dwellings.</p> <p>Why this is necessary:</p> <p>This change is required to ensure compliance with national policy protecting residential amenity. Without such a safeguard, the policy permits unacceptable enclosure, noise, light pollution and loss of outlook. Introducing a clear exclusion and buffer requirement ensures the policy properly considers material impacts and is therefore legally compliant and sound.</p> <p>Change 2: Require Site-Specific Residential Amenity Assessments</p>

Proposed change:
 Insert a requirement that any development brought forward under Policy AB2 must be supported by:
 A site-specific noise impact assessment
 A lighting and security impact assessment
 An assessment of cumulative impacts where development occurs near existing dwellings
 Why this is necessary:
 Warehousing is typically a 24-hour use with significant noise and lighting impacts. Requiring site-specific assessments ensures decisions are informed by evidence and not deferred to later stages, which is necessary for legal compliance and to ensure the policy is effective and justified.

Change 3: Protect Private Drainage Systems, Including Septic Tanks
 Proposed change:
 Add a criterion requiring that development under Policy AB2 must:
 Identify existing private drainage systems, including septic tanks
 Demonstrate that sufficient land is retained for their continued operation, maintenance and replacement
 Avoid sterilisation of land required for drainage
 Why this is necessary:
 Private drainage is a material planning consideration. Failure to address it risks environmental health impacts and undermines the long-term habitability of existing dwellings. Including this safeguard ensures the policy is based on a robust evidence base and is legally compliant and sound.

Change 4: Require Site-Specific Flood Risk and Surface Water Drainage Assessments
 Proposed change:
 Amend Policy AB2 to require site-specific flood risk and surface-water drainage assessments, including SuDS, where development is proposed near existing residential properties or on land known to experience surface-water flooding.
 Why this is necessary:
 The introduction of extensive hardstanding and buildings increases surface water runoff. Without requiring assessments at policy stage, the plan fails to address known flood risk issues. This change ensures consistency with national flood risk policy and is therefore legally compliant and justified.

Change 5: Demonstrate Exhaustion of Reasonable Alternatives, Including Cheshire East
 Proposed change:
 Amend the supporting text to require clear evidence that:
 Existing vacant and under-utilised warehouses, including those in Cheshire East, have been fully assessed
 Cross-boundary solutions have been explored through the Duty to Cooperate
 Green Belt release is a genuine last resort
 Why this is necessary:
 Green Belt boundaries can only be altered in exceptional circumstances. Failure to consider reasonable alternatives, including cross-boundary capacity, renders the policy unsound. This change ensures compliance with national policy and the Duty to Cooperate.

Change 6: Strengthen Green Belt Safeguards and Reduce Policy Flexibility
 Proposed change:
 Remove or narrow any wording that allows harm to be addressed "at application stage" and replace it with clear, mandatory criteria that must be met before development is supported.
 Why this is necessary:
 Deferring key matters to later stages undermines plan-making requirements. Clear criteria ensure the policy is effective, enforceable and consistent with national policy, making it sound.

Conclusion
 Without the above changes, Policy AB2:
 Fails to properly protect residential amenity
 Allows inappropriate Green Belt development without exceptional justification
 Lacks a robust evidence base
 Defers critical issues to the application stage
 In its current form, the policy is not legally compliant and not sound.
 The changes set out above are necessary to bring the proposed modification into compliance with national policy and established plan-making principles.

Comment ID	74
Response Date	15/12/2025 21:02:16
Consultee Family Name	Howell
Consultee Given Name	Emma
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications

Q4ref - MM Reference	MM67 - Policy AB2 (Land at Junction 16, M6)
Q4page - Page	46 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations Policy AB2
Q4policypara - Policy / Paragraph	Policy AB2 - Land at Junction 16 (M6), Main Modifications MM67/MM68
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Conflict with National Planning Policy Framework (NPPF) - Green Belt</p> <p>Policy AB2 is not legally compliant because it conflicts with the NPPF requirements for Green Belt Protection.</p> <p>The NPPF makes clear that:</p> <ul style="list-style-type: none"> Green Belt boundaries should only be altered in exceptional circumstances Inappropriate development in the Green Belt is by definition harmful Substantial weight must be given to any harm to the Green Belt. <p>Policy AB2 proposes large scale warehousing, an inherently urban and industrial use, on land currently designated as Green Belt. The policy fails to demonstrate:</p> <ul style="list-style-type: none"> Exceptional circumstances to justify this loss of Green Belt Why alternative non Green Belt or brownfield sites cannot meet the identified need. <p>The council has failed to demonstrate that reasonable alternatives to Green Belt release have been explored.</p> <p>There are existing vacant and under-utilised warehouse units within neighbouring boroughs, such as Cheshire East, which could accommodate the identified employment need.</p> <p>The NPPF requires Green Belt release to be a last resort and only justified where needs cannot be met elsewhere. Warehousing is a non-location-specific use and is well suited to re-use of existing premises.</p> <p>The council has not demonstrated effective engagement under the Duty to Cooperate, nor explained why existing capacity in adjoining authorities cannot meet the need.</p> <p>Failure to Properly Assess Residential Impacts</p> <ul style="list-style-type: none"> Policy AB2 fails to assess the impact of warehouse development on [redacted by admin] property that would be surrounded on three sides, creating an unacceptable degree of enclosure, visual dominance and loss of outlook. The policy does not address noise impacts associated with warehousing, including 24-hour operations, HGV movements, loading/unloading activity and reversing alarms. Light pollution and security infrastructure including floodlighting, CCTV and perimeter security, would result in constant illumination, loss of privacy and further industrialisation of the residential environment. The dwellings rely on septic tanks discharging into the surrounding land. Policy AB2 fails to assess the impact of development on the continued operation, maintenance and viability of this private drainage system, risking environmental health impacts. The policy fails to assess how extensive hardstanding, building foundations and altered ground levels associated with warehousing would increase surface runoff and exacerbate flood risk. <p>The cumulative impacts have not been assessed. Policy AB2 therefore fails to protect residential amenity and is not legally compliant or sound.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>Requested Changes to Policy AB2 to Ensure Legal Compliance and Soundness</p> <p>Change 1: Exclude Development that Surrounds Existing Residential Properties on Multiple Sides</p> <p>Proposed change:</p> <p>Amend Policy AB2 to prohibit warehouse development on land that would surround existing residential properties on two or more sides, and require a substantial undeveloped buffer between industrial uses and existing dwellings.</p> <p>Why this is necessary:</p> <p>This change is required to ensure compliance with national policy protecting residential amenity. Without such a safeguard, the policy permits unacceptable enclosure, noise, light pollution and loss of outlook. Introducing a clear exclusion and buffer requirement ensures the policy properly considers material impacts and is therefore legally compliant and sound.</p> <p>Change 2: Require Site-Specific Residential Amenity Assessments</p> <p>Proposed change:</p> <p>Insert a requirement that any development brought forward under Policy AB2 must be supported by:</p> <p>A site-specific noise impact assessment</p> <p>A lighting and security impact assessment</p> <p>An assessment of cumulative impacts where development occurs near existing dwellings</p> <p>Why this is necessary:</p> <p>Warehousing is typically a 24-hour use with significant noise and lighting impacts. Requiring site-specific assessments ensures decisions are informed by evidence and not deferred to later stages, which is necessary for legal compliance and to ensure the policy is effective and justified.</p>

Change 3: Protect Private Drainage Systems, Including Septic Tanks

Proposed change:

Add a criterion requiring that development under Policy AB2 must:

Identify existing private drainage systems, including septic tanks

Demonstrate that sufficient land is retained for their continued operation, maintenance and replacement

Avoid sterilisation of land required for drainage

Why this is necessary:

Private drainage is a material planning consideration. Failure to address it risks environmental health impacts and undermines the long-term habitability of existing dwellings. Including this safeguard ensures the policy is based on a robust evidence base and is legally compliant and sound.

Change 4: Require Site-Specific Flood Risk and Surface Water Drainage Assessments

Proposed change:

Amend Policy AB2 to require site-specific flood risk and surface-water drainage assessments, including SuDS, where development is proposed near existing residential properties or on land known to experience surface-water flooding.

Why this is necessary:

The introduction of extensive hardstanding and buildings increases surface water runoff. Without requiring assessments at policy stage, the plan fails to address known flood risk issues. This change ensures consistency with national flood risk policy and is therefore legally compliant and justified.

Change 5: Demonstrate Exhaustion of Reasonable Alternatives, Including Cheshire East

Proposed change:

Amend the supporting text to require clear evidence that:

Existing vacant and under-utilised warehouses, including those in Cheshire East, have been fully assessed

Cross-boundary solutions have been explored through the Duty to Cooperate

Green Belt release is a genuine last resort

Why this is necessary:

Green Belt boundaries can only be altered in exceptional circumstances. Failure to consider reasonable alternatives, including cross-boundary capacity, renders the policy unsound. This change ensures compliance with national policy and the Duty to Cooperate.

Change 6: Strengthen Green Belt Safeguards and Reduce Policy Flexibility

Proposed change:

Remove or narrow any wording that allows harm to be addressed “at application stage” and replace it with clear, mandatory criteria that must be met before development is supported.

Why this is necessary:

Deferring key matters to later stages undermines plan-making requirements. Clear criteria ensure the policy is effective, enforceable and consistent with national policy, making it sound.

Conclusion

Without the above changes, Policy AB2:

Fails to properly protect residential amenity

Allows inappropriate Green Belt development without exceptional justification

Lacks a robust evidence base

Defers critical issues to the application stage

In its current form, the policy is not legally compliant and not sound.

The changes set out above are necessary to bring the proposed modification into compliance with national policy and established plan-making principles.

Comment ID	5
Response Date	18/11/2025 16:36:00
Consultee Company / Organisation	Staffordshire Wildlife Trust
Consultee Position	Ecological Planning Manager
Consultee Family Name	Install
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM30
Q4page - Page	22 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 10 Infrastructure and Transport
Q4policypara - Policy / Paragraph	IN1 Infrastructure
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	IN1 - paragraph 5 - include Local Nature Recovery Strategy
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	IN1 - paragraph 5 - include Local Nature Recovery Strategy
Comment ID	2
Response Date	18/11/2025 16:36:00
Consultee Company / Organisation	Staffordshire Wildlife Trust
Consultee Position	Ecological Planning Manager
Consultee Family Name	Install
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM53
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MM53 SE8 - what is the definition of 'significant'? The inclusion of this would can lead to ambiguity and may result in more harm to the environment. We would prefer it removed and also removed in subsequent paragraphs - we would like to see a true commitment to nature's recovery.</p> <p>SE8 - LWS, SBI and BAS should be included in the list in paragraph 1 (we appreciate they are covered by not named in paragraph 4).</p> <ul style="list-style-type: none"> Do BOA opportunity areas relate to the LNRS - the LNRS should be included in paragraph 1? Is there anything that covers general biodiversity improvements - native planting, Swift boxes, hedgehog highways etc in alignment with https://www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems Paragraph:

	<p>017 Reference ID: 8-017-20250609 and requirements of section 40 of the NERC Act; the Biodiversity Duty. Also trying to reduce practices that harm the environment such as the use of artificial grass.</p> <ul style="list-style-type: none"> Paragraph 11 should also mention the LNRS / NRN
<p>Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>MM53 SE8 - what is the definition of 'significant'? The inclusion of this would can lead to ambiguity and may result in more harm to the environment. We would prefer it removed and also removed in subsequent paragraphs - we would like to see a true commitment to nature's recovery.</p> <p>SE8 - LWS, SBI and BAS should be included in the list in paragraph 1 (we appreciate they are covered by not named in paragraph 4).</p> <ul style="list-style-type: none"> Do BOA opportunity areas relate to the LNRS - the LNRS should be included in paragraph 1? Is there anything that covers general biodiversity improvements - native planting, Swift boxes, hedgehog highways etc in alignment with https://www.gov.uk/guidance/natural-environment#biodiversity-geodiversity-and-ecosystems Paragraph: 017 Reference ID: 8-017-20250609 and requirements of section 40 of the NERC Act; the Biodiversity Duty. Also trying to reduce practices that harm the environment such as the use of artificial grass. Paragraph 11 should also mention the LNRS / NRN
Comment ID	4
Response Date	18/11/2025 16:36:00
Consultee Company / Organisation	Staffordshire Wildlife Trust
Consultee Position	Ecological Planning Manager
Consultee Family Name	Install
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM57
Q4page - Page	41 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4policypara - Policy / Paragraph	SE11 Trees, hedgerows and woodland
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	MM57 - would recommend replacement of at least 3 trees per tree lost or as per Bristol's tree compensation standard pasted below (admin note, document attached)
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	MM57 - would recommend replacement of at least 3 trees per tree lost or as per Bristol's tree compensation standard pasted below (admin note, document attached)
Attachments	1372733 C Install SWT.pdf
Comment ID	3
Response Date	18/11/2025 16:36:00
Consultee Company / Organisation	Staffordshire Wildlife Trust
Consultee Position	Ecological Planning Manager
Consultee Family Name	Install
Consultee Given Name	Claire

Q3 Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4 ref - MM Reference	MM51
Q4 page - Page	35 of Modification Schedule
Q4 chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4 policypara - Policy / Paragraph	SE7 Biodiversity Net Gain
Q5 LegallyCompliant - Legally compliant	Yes
Q5 Sound - Sound	No
Q6 Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	MMS1 SE7 Even except developments are required to deliver a net gain in biodiversity as per the NPPF (this is acknowledged in 11.37), we would like to see this rephrased to include this as well as the 10% for developments subject to statutory BNG. The phrase 'biodiversity habitat' does not really make sense - suggest rewording.
Q7 Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	MMS1 SE7 Even except developments are required to deliver a net gain in biodiversity as per the NPPF (this is acknowledged in 11.37), we would like to see this rephrased to include this as well as the 10% for developments subject to statutory BNG. The phrase 'biodiversity habitat' does not really make sense - suggest rewording.

Comment ID	30
Response Date	09/12/2025 14:55:00
Consultee Family Name	Jervis
Consultee Given Name	Tom
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps
Q4ref - MM Reference	78
Q4page - Page	56 of Main Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	13 Site Allocations
Q4policypara - Policy / Paragraph	KL15
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Justification of the Release of KL15 from green belt</p> <p>The Inspector notes (pt 18) there is an absence of an up-to-date Masterplan for the Keele university estate Release of KL15 from green belt can only be Sound justifiable if there is a development plan Supported by Real Evidence (Anyone can create a wish list) current evidence from KU is that it is struggling & not growing. KL15 should only be developed when all alternatives are exhausted, optimising KL13 and the existing university site.</p> <p>National planning policy requires "exceptional circumstances" to alter Green Belt boundaries The plan does not provide evidence in each case where green space is lost how this is justified or mitigated / compensated (see also Inspectors pt 36).</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<ol style="list-style-type: none"> 1 KL15 - A wild life corridor should be maintained between the butts Bluebell woods adjacent to Paris avenue and Barkers wood. The plan may describe this as Flagstaff plantation which isn't on Google / OS / bing maps. 2 KL15 should only be developed when all alternatives are exhausted, optimising KL13 and the existing university site in which many areas could be developed first. Also many university residential buildings which are old & poorly maintained and should be redeveloped into larger multi-storey accommodation units first, before any expansion. There is not justification to develop the sites simultaneously. I am not against further development of KL13 as it is already semi developed, plan or no-plan
Comment ID	31
Response Date	09/12/2025 14:55:00
Consultee Family Name	Jervis
Consultee Given Name	Tom
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps
Q4ref - MM Reference	90
Q4page - Page	61 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	SP11
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>SP11 - National planning policy requires "exceptional circumstances" to alter Green Belt boundaries The plan does not provide evidence in each case where green space is lost how this is justified or mitigated / compensated (see also Inspectors pt 36). For instance, SP11 is a valuable current amenity, what is it being replaced by? The Compensations in 5.33 (PSD5) are vague and inadequate mitigation to the considerable impacts caused by planned developments.</p> <p>The Inspector (pt 36) requires Compensatory measure for the loss of greenbelt. These have not been provided.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed	The Inspector (pt 36) requires Compensatory measure for the loss of greenbelt.

Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SP11 is a wonderful wide-open green space enjoyed by many locals, who enjoy beautiful views of large expanses of open land. The proposed development will obviously ruin this. Although the development is marketed as a country park, the reality will be a paying field surrounded by housing. The benefits of open green spaces and recreation areas are well known, and the plan acknowledges this but has **not** put forward any plans to replace the SP11 with an alternative open space accessible by the public.

A large reduction in the size of the development of SP11 sites (specifically vastly reducing or eliminating SP11 1 & 2) would be a workable compromise and mitigation to the SP11 impacts, where views and benefits of this large expanse of open land could be retained and enjoyed by the population.

Comment ID	47
Response Date	14/12/2025 21:17:40
Consultee Family Name	Kelter
Consultee Given Name	Aaron
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67 - Policy AB2 (Land at Junction 16, M6)
Q4page - Page	46
Q4chap - Chapter, Appendix Number or Map Inset	13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 - Land at Junction 16 (M6), Main Modifications MM67/MM68
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The proposed Main Modifications relating to Policy AB2 (Land at Junction 16, M6) are not sound, as they are not justified or effective in addressing the impacts of the allocation.</p> <p>My property is [redacted by admin] . While the site has been configured to exclude these properties from the allocation, they remain almost entirely surrounded by the AB2 site and are clearly identifiable on the submitted indicative landscape and layout plans. As a result, the proposed development would be experienced in very close proximity on multiple sides, rather than from a single boundary edge.</p> <p>The indicative plans demonstrate that the scale, massing and proximity of the proposed logistics buildings would result in a dominant and overbearing visual impact on these existing residential properties. This harm arises from the fundamental size and scale of the development proposed in such close proximity to established homes, rather than from a lack of landscaping detail.</p> <p>While the policy relies on a landscape-led approach, bunding, planting and green corridors to mitigate visual impacts, the indicative plans show that these measures would not be sufficient to address the level of harm arising from the scale and massing of the buildings. In this context, no reasonable amount of screening or planting can adequately mitigate the visual dominance experienced by properties that are effectively surrounded by the site.</p> <p>Furthermore, the indicative landscape strategy relies heavily on substantial earth mounding and structural planting. However, the plans identify high-pressure gas infrastructure within the site. Such infrastructure is subject to statutory easements and safety constraints which typically restrict significant changes to ground levels, loading and deep-rooted planting. This raises doubt as to whether the scale of mounding and mitigation illustrated can be delivered in practice, particularly in areas closest to the existing dwellings.</p> <p>In addition, [redacted by admin] a private septic tank and drainage field which relies on existing ground conditions and established drainage patterns. The proposed development involves extensive ground re-profiling and changes to surface water management in very close proximity to these properties. At present, there is insufficient clarity within the policy framework to demonstrate how such works would avoid adverse impacts on existing private drainage systems.</p> <p>Taken together, these matters indicate that the allocation relies on mitigation measures that may not be deliverable and that the impacts on existing residential amenity have not been adequately addressed. As such, the proposed Main Modifications fail the tests of soundness in terms of justification and effectiveness.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To ensure that Policy AB2 is legally compliant and sound, the Main Modifications should be strengthened to provide clear, enforceable and realistic safeguards for existing residential properties located within and immediately adjacent to the site.</p> <p>In particular, the policy should require materially greater separation distances between large-scale logistics buildings and existing dwellings, including the identification of no-build or exclusion zones around the three Park Lane cottages. Reduced building heights should be required on all edges facing these properties to prevent dominant and overbearing impacts.</p> <p>The policy should also require that any proposed landscape mounding, earthworks or structural planting are demonstrated to be feasible having regard to the presence of high-pressure gas infrastructure and associated statutory constraints, rather than relying on indicative mitigation that may not be deliverable in practice.</p> <p>In addition, the policy should require that detailed drainage strategies explicitly demonstrate how existing private septic drainage systems will be protected from adverse impacts arising from ground re-profiling, construction activity and changes to surface water management.</p> <p>These changes are necessary to ensure that the allocation can be delivered effectively and without unacceptable harm to existing residential amenity. Without such amendments, the policy relies on mitigation assumptions that cannot realistically resolve the impacts identified, leaving them to be addressed at planning application stage when the fundamental constraints of the site cannot be altered. This renders the allocation unsound.</p>
Comment ID	70
Response Date	14/12/2025 21:17:00

Consultee Family Name	Kelter
Consultee Given Name	Aaron
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM68 - Policy AB2 (Land at Junction 16, M6)
Q4page - Page	47
Q4chap - Chapter, Appendix Number or Map Inset	13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy AB2 - Land at Junction 16 (M6), Main Modifications MM67/MM68
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The proposed Main Modifications relating to Policy AB2 (Land at Junction 16, M6) are not sound, as they are not justified or effective in addressing the impacts of the allocation.</p> <p>My property is [redacted by admin] . While the site has been configured to exclude these properties from the allocation, they remain almost entirely surrounded by the AB2 site and are clearly identifiable on the submitted indicative landscape and layout plans. As a result, the proposed development would be experienced in very close proximity on multiple sides, rather than from a single boundary edge.</p> <p>The indicative plans demonstrate that the scale, massing and proximity of the proposed logistics buildings would result in a dominant and overbearing visual impact on these existing residential properties. This harm arises from the fundamental size and scale of the development proposed in such close proximity to established homes, rather than from a lack of landscaping detail.</p> <p>While the policy relies on a landscape-led approach, bunding, planting and green corridors to mitigate visual impacts, the indicative plans show that these measures would not be sufficient to address the level of harm arising from the scale and massing of the buildings. In this context, no reasonable amount of screening or planting can adequately mitigate the visual dominance experienced by properties that are effectively surrounded by the site.</p> <p>Furthermore, the indicative landscape strategy relies heavily on substantial earth mounding and structural planting. However, the plans identify high-pressure gas infrastructure within the site. Such infrastructure is subject to statutory easements and safety constraints which typically restrict significant changes to ground levels, loading and deep-rooted planting. This raises doubt as to whether the scale of mounding and mitigation illustrated can be delivered in practice, particularly in areas closest to the existing dwellings.</p> <p>In addition, [redacted by admin] a private septic tank and drainage field which relies on existing ground conditions and established drainage patterns. The proposed development involves extensive ground re-profiling and changes to surface water management in very close proximity to these properties. At present, there is insufficient clarity within the policy framework to demonstrate how such works would avoid adverse impacts on existing private drainage systems.</p> <p>Taken together, these matters indicate that the allocation relies on mitigation measures that may not be deliverable and that the impacts on existing residential amenity have not been adequately addressed. As such, the proposed Main Modifications fail the tests of soundness in terms of justification and effectiveness.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To ensure that Policy AB2 is legally compliant and sound, the Main Modifications should be strengthened to provide clear, enforceable and realistic safeguards for existing residential properties located within and immediately adjacent to the site.</p> <p>In particular, the policy should require materially greater separation distances between large-scale logistics buildings and existing dwellings, including the identification of no-build or exclusion zones around the three Park Lane cottages. Reduced building heights should be required on all edges facing these properties to prevent dominant and overbearing impacts.</p> <p>The policy should also require that any proposed landscape mounding, earthworks or structural planting are demonstrated to be feasible having regard to the presence of high-pressure gas infrastructure and associated statutory constraints, rather than relying on indicative mitigation that may not be deliverable in practice.</p> <p>In addition, the policy should require that detailed drainage strategies explicitly demonstrate how existing private septic drainage systems will be protected from adverse impacts arising from ground re-profiling, construction activity and changes to surface water management.</p> <p>These changes are necessary to ensure that the allocation can be delivered effectively and without unacceptable harm to existing residential amenity. Without such amendments, the policy relies on mitigation assumptions that cannot realistically resolve the impacts identified, leaving them to be addressed at planning application stage when the fundamental constraints of the site cannot be altered. This renders the allocation unsound.</p>

Comment ID	177
Response Date	17/12/2025 11:18:00
Consultee Family Name	Lewis
Consultee Given Name	Rebekah
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 'Land at J16'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Good Afternoon,</p> <p>I am writing further to the final stage of consultation on the Local Plan to place on record serious concerns raised with me by residents regarding the proposed allocation of Site AB2.</p> <p>Residents have contacted me to express strong opposition to the inclusion of this site, particularly in relation to employment land need, traffic impacts, and the availability of more suitable and strategically appropriate sites within the borough.</p> <p>Firstly, in respect of employment land provision, the Local Plan identifies a requirement for 80 hectares of employment land. The current plan provides for 148.94 hectares, significantly exceeding the identified need. Even if Site AB2 were to be removed from the plan, the overall provision would remain comfortably above the required level. As such, the inclusion of Site AB2 is not necessary to meet employment land targets, and its removal would not undermine the soundness of the plan in this regard.</p> <p>Secondly, there are significant and ongoing highway and traffic concerns in the area surrounding Site AB2. Residents have highlighted existing issues where local roads are already struggling to cope, particularly with diverted HGV traffic. These problems are compounded by well-documented safety and capacity issues at the A500 junction, where accidents regularly result in congestion, delays, and further traffic being displaced onto unsuitable local routes. The additional traffic generated by the development of Site AB2 would exacerbate these problems and raise legitimate concerns regarding highway safety and network resilience.</p> <p>Thirdly, it is important to note that there are already strategic and suitable employment sites available within the local area, which have previously been agreed and supported by Newcastle-under-Lyme Borough Council. These sites are better located, more sustainable, and do not raise the same level of infrastructure and community impact concerns as Site AB2. Given this, the allocation of AB2 appears unnecessary and unjustified when assessed against reasonable alternatives.</p> <p>In summary, residents' concerns are well founded. The inclusion of Site AB2 is not required to meet employment land needs, presents significant and unresolved traffic and highway issues, and is not the most appropriate option when suitable alternative sites are already available and agreed. I therefore urge that Site AB2 be reconsidered and removed from the Local Plan allocation at this final stage.</p>

Comment ID	11
Response Date	27/11/2025 10:23:00
Consultee Company / Organisation	The Coal Authority
Consultee Position	Principal Planning & Development Manager
Consultee Family Name	Lindsley
Consultee Given Name	Melanie
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM01
Q4page - Page	2 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 4 Strategic Objectives of the Plan
Q4policypara - Policy / Paragraph	Paragraph 4.8
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your notification of the 5th November 2025 seeking the views of the Coal Authority on the above. The Coal Authority, now trading as the Mining Remediation Authority, is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. I can confirm that the Planning team at the Coal Authority have no specific comments to make on the Main Modifications proposed.</p>

Comment ID	124
Response Date	15/12/2025 11:14:00
Consultee Family Name	Maddock
Consultee Given Name	Paul
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM70
Q4page - Page	Pg 50 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB15 Land North of Vernon Avenue
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Policy AB15 (MM70) (Land North of Vernon Avenue)</p> <p>For submission to Inspector Jordan / Local Plan Modifications Consultation</p> <p>I wish to register a formal objection to the proposed modifications to Policy AB15 (MM70). The changes significantly weaken the policy, reduce public protection, and fail to address multiple critical risks. In its current form, AB15 cannot be considered sound, justified, or compliant with national planning requirements.</p> <p>1 Serious Ground Stability Concerns Ignored – Potential Tunnel / Voids</p> <p>Local testimony, historic evidence, and longstanding community knowledge indicate that an underground tunnel, void, or sub-surface structure may exist beneath or close to the AB15 site. This presents a major safety risk. Yet the modification to Criterion 3 only requires a contamination assessment, which does nothing to identify collapse risks, historic shafts, voids, or structural instability associated with former mining and medieval activity. Failing to require geophysical survey and full geotechnical investigation at this stage is irresponsible and unsafe. No site with unresolved underground features can be called “deliverable.” If this issue is not addressed now, it has the potential to cause:</p> <p>land failure</p> <p>subsidence under HGV loading</p> <p>severe construction delays</p> <p>public safety risks</p> <p>major financial liability for the authority</p> <p>This alone is sufficient to render the allocation unsound.</p> <p>1 Deletion of SA1 Safeguards is Unacceptable</p> <p>Removing the requirement to comply with Policy SA1 strips away essential protections relating to:</p> <p>access</p> <p>heritage</p> <p>landscape</p> <p>environmental constraints</p> <p>infrastructure</p> <p>This places the burden of risk on residents rather than developers and weakens the policy to the point where meaningful oversight is lost. It is unclear how the Inspector can justify making the site less regulated at a time when risks are increasing, not decreasing.</p> <p>1 Heritage Protection is Diluted to the Point of Meaninglessness</p> <p>The deletion of the requirement to retain the medieval field system and its replacement with simple “recording” is wholly inadequate. This allows the destruction of a potentially significant historic landscape, and when combined with reports of a sub-surface structure, it risks losing heritage features that may never be recovered. Recording is not mitigation. It is documentation of loss. This is contrary to the NPPF and to the council's statutory heritage duties. Allowing this harm would be negligent and unjustified.</p> <p>1 Landscape Mitigation is Vague and unenforceable</p> <p>Terms such as “landscape-led” and “not intrusive” carry no measurable meaning.</p> <p>Without:</p> <p>height limits</p> <p>view protections</p> <p>massing controls</p> <p>landscape buffers</p> <p>developers can easily sidestep the intent of the policy.</p> <p>This makes the modification ineffective and leaves residents with no real protection from visual or environmental harm.</p>

Conclusion – The Allocation is Not Sound

The modifications dilute safeguards, ignore hard evidence of ground risks, remove heritage protections, and rely on weak, vague wording that cannot be enforced. AB15 should not proceed in its modified form. Before any further progress is allowed, there must be:

- 1 Full geotechnical and geophysical investigation (including GPR)
- 2 Archaeological desk-based assessment and field evaluation
- 3 Restoration of strong heritage and landscape protections
- 4 Reinstatement of the general requirements removed under SA1

Without these minimum safeguards, the allocation remains unsafe, unjustified, and unsound.

Furthermore, the recent approval of 39 houses at New Farm, Cross Lane, Audley, contributes to the local housing supply and reduces the justification for allocation of AB15.

Comment ID	101
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM46
Q4page - Page	32 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4polycypara - Policy / Paragraph	SE4 Sustainable Drainage Systems
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>Water Quality</p> <p>Natural England welcome the additions at 'MM49' which recognise that development proposals should have regard to impacts on linked catchments including but not limited to the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site.</p> <p>"MM49 To amend / add additional text to Paragraph 11.23, as follows: - "11.23.Relevant development proposals should have regard to Water Framework Directive catchment areas (in the North West / Humber catchment) and also River Basin Management Plans". (pg 85 of the PDF version Paragraph 11.23 (supporting information to Policy SE5 Water Resources and Water Quality"</p> <p>Natural England welcome the following modifications which collectively support the commitments in Policy SE5 'MM45', 'MM45' and 'MM46' and 'MM47' relating to flooding, surface water sustainable drainage and water quality.</p>
Attachments	1364617 Natural England.pdf
Comment ID	105
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM97
Q4page - Page	66 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13: Site Allocation
Q4polycypara - Policy / Paragraph	BL18 Land at Clough Hall
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>BL18 – Clough Hall Playing Fields, Talke</p>

	<p>As previously stated in our 4th October 2024 response to the regulation 19 pre-submission draft Plan NE reference 486256. Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.</p> <p>Natural England note the following modifications and request formal consultation on the assessments detailed below;</p> <p>-</p> <p>‘MM97’ p141 Policy BL18 (Land at Clough Hall) Criterion 4 To amend criteria 4, as follows: ...including surface water flooding and sewer flooding. A site-specific Flood Risk Assessment and Drainage Strategy for the site should be prepared.</p> <p>-</p> <p>‘MM98’ p42 Paragraph 13.205 (supporting information to Policy BL18 Land at Clough Hall) To amend Paragraph 13.205, as follows: - To add additional text to the end of Paragraph 13.205: “...The sewers and risk of flooding will need careful assessment in the detailed design, masterplanning and drainage details for the site. Applicants should engage with relevant statutory undertakers, as appropriate”.</p>
Attachments	1364617 Natural England.pdf
Comment ID	109
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13: Site Allocation
Q4policypara - Policy / Paragraph	AB2 Land at Junction 16
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>AB2 – Land Adjoining Corner of A500 and M6 Southbound</p> <p>Natural England note the proposed commitment to provide at least that 40% of this entirely green belt allocation site to strategic interconnected greenspaces.</p> <p>-</p> <p>‘MM67’ “Policy AB2 (Land at J16 of the M6) Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site</p> <p>Natural England recommend that the design and future management of green and blue infrastructure is integral to site master planning for the benefit of people and nature.</p> <p>The relevant statutory agencies should be involved in master planning from the outset to ensure; the sustainable management of soils and water, alongside the creation of ecological corridors which consider / incorporate intact habitats and existing linkages and allow species to move and thrive.</p> <p>Natural England welcome ‘MM67’ criteria 13; to amend, by adding an additional sentence as follows: -</p> <p>“Travel Planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531”</p> <p>Sites adjacent to ancient woodland and priority habitats.</p> <p>For sites adjacent to ancient woodland / priority habitats (including but not limited to the following sites) Natural England welcomes:</p> <p>-</p> <p>‘MM57’ 88-89 Policy SE11 To amend criteria 7, as follows: - Development proposals adjacent to existing woodlands should consider potential impacts and incorporate appropriate mitigation measures. This may include: establishing buffer zones, mitigating light pollution and ensuring that development does not disrupt the natural hydrological flows and connectivity between woodlands and watercourses</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p> <p>SP11 – Former Keele Municipal Golf Course</p> <p>MD29 - Land North of Bar Hill</p> <p>Natural England welcomes the following additions;</p> <p>- ‘MM87’ Policy MD29 (Land North of Bar Hill) To make the following updates to criteria ,7 and 8 of the policy:- 7. Any masterplanning work on the site should take into account the proximity of Bar Hill Ancient Woodland to the west of the site. A tree survey and an ecological survey should be undertaken to understand and mitigate any impacts on Ancient Woodland as appropriate.</p> <p>8. A tree survey should be prepared to identify trees subject to Tree Preservation Orders, as appropriate.</p>

	<p>LW53 – Land at Corner of Mucklestone Wood Land</p> <p>Natural England notes the following reference in ‘MM86’ and Natural England advises your authority that this Residential housing development proposal is located within the Impact Risk Zone (IRZ) of a protected site (Burnt Wood Site of Special Scientific interest / SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England:</p> <p>-</p> <p>‘MM86’ page129 “land contamination assessment and mitigation strategy in relation to impact of the former Tagedale Quarry landfill site” and the requirement for a “Submission of an appropriate assessment and mitigation strategy to prevent deterioration of the SPZ3 Bearstone Groundwater Protection Zone and protect controlled water receptors”</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A, admin note, see attachment).</p>
Attachments	1364617 Natural England.pdf
Comment ID	113
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM57
Q4page - Page	41 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4policypara - Policy / Paragraph	SE11 Trees, Hedgerows and Woodland
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>AB2 – Land Adjoining Corner of A500 and M6 Southbound</p> <p>Natural England note the proposed commitment to provide at least that 40% of this entirely green belt allocation site to strategic interconnected greenspaces.</p> <p>-</p> <p>‘MM67’ “Policy AB2 (Land at J16 of the M6) Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site</p> <p>Natural England recommend that the design and future management of green and blue infrastructure is integral to site master planning for the benefit of people and nature.</p> <p>The relevant statutory agencies should be involved in master planning from the outset to ensure; the sustainable management of soils and water, alongside the creation of ecological corridors which consider / incorporate intact habitats and existing linkages and allow species to move and thrive.</p> <p>Natural England welcome ‘MM67’ criteria 13; to amend, by adding an additional sentence as follows: -</p> <p>“Travel Planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531”</p> <p>Sites adjacent to ancient woodland and priority habitats.</p> <p>For sites adjacent to ancient woodland / priority habitats (including but not limited to the following sites) Natural England welcomes:</p> <p>-</p> <p>‘MM57’ 88-89 Policy SE11 To amend criteria 7, as follows: - Development proposals adjacent to existing woodlands should consider potential impacts and incorporate appropriate mitigation measures. This may include: establishing buffer zones, mitigating light pollution and ensuring that development does not disrupt the natural hydrological flows and connectivity between woodlands and watercourses</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p> <p>SP11 – Former Keele Municipal Golf Course</p> <p>MD29 - Land North of Bar Hill</p> <p>Natural England welcomes the following additions;</p> <p>- ‘MM87’ Policy MD29 (Land North of Bar Hill) To make the following updates to criteria ,7 and 8 of the policy:- 7. Any masterplanning work on the site should take into account the proximity of Bar Hill Ancient Woodland to the west of the site. A tree survey and an ecological survey should be undertaken to understand and mitigate any impacts on Ancient Woodland as appropriate.</p> <p>8. A tree survey should be prepared to identify trees subject to Tree Preservation Orders, as appropriate.</p>

	<p>LW53 – Land at Corner of Mucklestone Wood Land</p> <p>Natural England notes the following reference in ‘MM86’ and Natural England advises your authority that this Residential housing development proposal is located within the Impact Risk Zone (IRZ) of a protected site (Burnt Wood Site of Special Scientific interest / SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England:</p> <p>-</p> <p>‘MM86’ page129 “land contamination assessment and mitigation strategy in relation to impact of the former Tagedale Quarry landfill site” and the requirement for a “Submission of an appropriate assessment and mitigation strategy to prevent deterioration of the SPZ3 Bearstone Groundwater Protection Zone and protect controlled water receptors”</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A, admin note, see attachment).</p>
Attachments	1364617 Natural England.pdf
Comment ID	117
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM87
Q4page - Page	60 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	MD29 Land North of Bar Hill
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>AB2 – Land Adjoining Corner of A500 and M6 Southbound</p> <p>Natural England note the proposed commitment to provide at least that 40% of this entirely green belt allocation site to strategic interconnected greenspaces.</p> <p>-</p> <p>‘MM67’ “Policy AB2 (Land at J16 of the M6) Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site</p> <p>Natural England recommend that the design and future management of green and blue infrastructure is integral to site master planning for the benefit of people and nature.</p> <p>The relevant statutory agencies should be involved in master planning from the outset to ensure; the sustainable management of soils and water, alongside the creation of ecological corridors which consider / incorporate intact habitats and existing linkages and allow species to move and thrive.</p> <p>Natural England welcome ‘MM67’ criteria 13; to amend, by adding an additional sentence as follows: -</p> <p>“Travel Planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531”</p> <p>Sites adjacent to ancient woodland and priority habitats.</p> <p>For sites adjacent to ancient woodland / priority habitats (including but not limited to the following sites) Natural England welcomes:</p> <p>-</p> <p>‘MM57’ 88-89 Policy SE11 To amend criteria 7, as follows: - Development proposals adjacent to existing woodlands should consider potential impacts and incorporate appropriate mitigation measures. This may include: establishing buffer zones, mitigating light pollution and ensuring that development does not disrupt the natural hydrological flows and connectivity between woodlands and watercourses</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p> <p>SP11 – Former Keele Municipal Golf Course</p> <p>MD29 - Land North of Bar Hill</p> <p>Natural England welcomes the following additions;</p> <p>- ‘MM87’ Policy MD29 (Land North of Bar Hill) To make the following updates to criteria ,7 and 8 of the policy:-</p> <p>7. Any masterplanning work on the site should take into account the proximity of Bar Hill Ancient Woodland to the west of the site. A tree survey and an ecological survey should be undertaken to understand and mitigate any impacts on Ancient Woodland as appropriate.</p> <p>8. A tree survey should be prepared to identify trees subject to Tree Preservation Orders, as appropriate.</p>

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Attachments	1364617 Natural England.pdf
Comment ID	114
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM77
Q4page - Page	55 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	KL13 land at Keele University
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>AB2 – Land Adjoining Corner of A500 and M6 Southbound</p> <p>Natural England note the proposed commitment to provide at least that 40% of this entirely green belt allocation site to strategic interconnected greenspaces.</p> <p>-</p> <p>‘MM67’ “Policy AB2 (Land at J16 of the M6) Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site</p> <p>Natural England recommend that the design and future management of green and blue infrastructure is integral to site master planning for the benefit of people and nature.</p> <p>The relevant statutory agencies should be involved in master planning from the outset to ensure; the sustainable management of soils and water, alongside the creation of ecological corridors which consider / incorporate intact habitats and existing linkages and allow species to move and thrive.</p> <p>Natural England welcome ‘MM67’ criteria 13; to amend, by adding an additional sentence as follows: -</p> <p>“Travel Planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531”</p> <p>Sites adjacent to ancient woodland and priority habitats.</p> <p>For sites adjacent to ancient woodland / priority habitats (including but not limited to the following sites) Natural England welcomes:</p> <p>-</p> <p>‘MM57’ 88-89 Policy SE11 To amend criteria 7, as follows: - Development proposals adjacent to existing woodlands should consider potential impacts and incorporate appropriate mitigation measures. This may include: establishing buffer zones, mitigating light pollution and ensuring that development does not disrupt the natural hydrological flows and connectivity between woodlands and watercourses</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p> <p>SP11 – Former Keele Municipal Golf Course</p> <p>MD29 - Land North of Bar Hill</p> <p>Natural England welcomes the following additions;</p> <p>- ‘MM87’ Policy MD29 (Land North of Bar Hill) To make the following updates to criteria ,7 and 8 of the policy:- 7. Any masterplanning work on the site should take into account the proximity of Bar Hill Ancient Woodland to the west of the site. A tree survey and an ecological survey should be undertaken to understand and mitigate any impacts on Ancient Woodland as appropriate.</p> <p>8. A tree survey should be prepared to identify trees subject to Tree Preservation Orders, as appropriate.</p>

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Attachments	1364617 Natural England.pdf
Comment ID	118
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM86
Q4page - Page	59 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	LW53 Land Corner of Mucklestone Wood Lane
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>AB2 – Land Adjoining Corner of A500 and M6 Southbound</p> <p>Natural England note the proposed commitment to provide at least that 40% of this entirely green belt allocation site to strategic interconnected greenspaces.</p> <p>-</p> <p>‘MM67’ “Policy AB2 (Land at J16 of the M6) Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site</p> <p>Natural England recommend that the design and future management of green and blue infrastructure is integral to site master planning for the benefit of people and nature.</p> <p>The relevant statutory agencies should be involved in master planning from the outset to ensure; the sustainable management of soils and water, alongside the creation of ecological corridors which consider / incorporate intact habitats and existing linkages and allow species to move and thrive.</p> <p>Natural England welcome ‘MM67’ criteria 13; to amend, by adding an additional sentence as follows: -</p> <p>“Travel Planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531”</p> <p>Sites adjacent to ancient woodland and priority habitats.</p> <p>For sites adjacent to ancient woodland / priority habitats (including but not limited to the following sites) Natural England welcomes:</p> <p>-</p> <p>‘MM57’ 88-89 Policy SE11 To amend criteria 7, as follows: - Development proposals adjacent to existing woodlands should consider potential impacts and incorporate appropriate mitigation measures. This may include: establishing buffer zones, mitigating light pollution and ensuring that development does not disrupt the natural hydrological flows and connectivity between woodlands and watercourses</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p> <p>SP11 – Former Keele Municipal Golf Course</p> <p>MD29 - Land North of Bar Hill</p> <p>Natural England welcomes the following additions;</p> <p>- ‘MM87’ Policy MD29 (Land North of Bar Hill) To make the following updates to criteria ,7 and 8 of the policy:- 7. Any masterplanning work on the site should take into account the proximity of Bar Hill Ancient Woodland to the west of the site. A tree survey and an ecological survey should be undertaken to understand and mitigate any impacts on Ancient Woodland as appropriate.</p> <p>8. A tree survey should be prepared to identify trees subject to Tree Preservation Orders, as appropriate.</p>

	<p>LW53 – Land at Corner of Mucklestone Wood Land</p> <p>Natural England notes the following reference in ‘MM86’ and Natural England advises your authority that this Residential housing development proposal is located within the Impact Risk Zone (IRZ) of a protected site (Burnt Wood Site of Special Scientific interest / SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England:</p> <p>-</p> <p>‘MM86’ page129 “land contamination assessment and mitigation strategy in relation to impact of the former Tagedale Quarry landfill site” and the requirement for a “Submission of an appropriate assessment and mitigation strategy to prevent deterioration of the SPZ3 Bearstone Groundwater Protection Zone and protect controlled water receptors”</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A, admin note, see attachment).</p>
Attachments	1364617 Natural England.pdf
Comment ID	102
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM47
Q4page - Page	33 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4policypara - Policy / Paragraph	SE4 Sustainable Drainage Systems Supporting Text
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>Water Quality</p> <p>Natural England welcome the additions at ‘MM49’ which recognise that development proposals should have regard to impacts on linked catchments including but not limited to the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site.</p> <p>“MM49 To amend / add additional text to Paragraph 11.23, as follows: - “11.23.Relevant development proposals should have regard to Water Framework Directive catchment areas (in the North West / Humber catchment) and also River Basin Management Plans”. (pg 85 of the PDF version Paragraph 11.23 (supporting information to Policy SE5 Water Resources and Water Quality”</p> <p>Natural England welcome the following modifications which collectively support the commitments in Policy SE5 ‘MM45’, ‘MM45’ and ‘MM46’ and ‘MM47’ relating to flooding, surface water sustainable drainage and water quality.</p>
Attachments	1364617 Natural England.pdf
Comment ID	115
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM78
Q4page - Page	56 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	KL15 land at Keele University

<p>Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.</p>	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>AB2 – Land Adjoining Corner of A500 and M6 Southbound</p> <p>Natural England note the proposed commitment to provide at least that 40% of this entirely green belt allocation site to strategic interconnected greenspaces.</p> <p>-</p> <p>‘MM67’ “Policy AB2 (Land at J16 of the M6) Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site</p> <p>Natural England recommend that the design and future management of green and blue infrastructure is integral to site master planning for the benefit of people and nature.</p> <p>The relevant statutory agencies should be involved in master planning from the outset to ensure; the sustainable management of soils and water, alongside the creation of ecological corridors which consider / incorporate intact habitats and existing linkages and allow species to move and thrive.</p> <p>Natural England welcome ‘MM67’ criteria 13; to amend, by adding an additional sentence as follows: -</p> <p>“Travel Planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531”</p> <p>Sites adjacent to ancient woodland and priority habitats.</p> <p>For sites adjacent to ancient woodland / priority habitats (including but not limited to the following sites) Natural England welcomes:</p> <p>-</p> <p>‘MM57’ 88-89 Policy SE11 To amend criteria 7, as follows: - Development proposals adjacent to existing woodlands should consider potential impacts and incorporate appropriate mitigation measures. This may include: establishing buffer zones, mitigating light pollution and ensuring that development does not disrupt the natural hydrological flows and connectivity between woodlands and watercourses</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p> <p>SP11 – Former Keele Municipal Golf Course</p> <p>MD29 - Land North of Bar Hill</p> <p>Natural England welcomes the following additions;</p> <p>- ‘MM87’ Policy MD29 (Land North of Bar Hill) To make the following updates to criteria ,7 and 8 of the policy:- 7. Any masterplanning work on the site should take into account the proximity of Bar Hill Ancient Woodland to the west of the site. A tree survey and an ecological survey should be undertaken to understand and mitigate any impacts on Ancient Woodland as appropriate.</p> <p>8. A tree survey should be prepared to identify trees subject to Tree Preservation Orders, as appropriate.</p> <p>LW53 – Land at Corner of Muckleston Wood Land</p> <p>Natural England notes the following reference in ‘MM86’ and Natural England advises your authority that this Residential housing development proposal is located within the Impact Risk Zone (IRZ) of a protected site (Burnt Wood Site of Special Scientific interest / SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England:</p> <p>-</p> <p>‘MM86’ page129 “land contamination assessment and mitigation strategy in relation to impact of the former Tagedale Quarry landfill site” and the requirement for a “Submission of an appropriate assessment and mitigation strategy to prevent deterioration of the SPZ3 Bearstone Groundwater Protection Zone and protect controlled water receptors”</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A, admin note, see attachment).</p>
Attachments	1364617 Natural England.pdf
Comment ID	103
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM08
Q4page - Page	33 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD5 Green Belt

Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>Green Belt</p> <p>Natural England note that greenbelt allocations in areas identified as making a “strong overall contribution to the purposes of the Green Belt” have been reduced and the following related modifications at “MM08” are welcomed.</p> <p>“The introduction of a new criterion 7 (pgs. 28,29 &30 of the PDF version) Policy PSD5 (Green Belt) Development proposals for sites removed from the Green Belt should establish a recognisable and permanent new boundary to the Green Belt.”</p> <p>“To amend paragraph 5.33 as follows: - 5.33 Compensatory improvements to the Green Belt will be secured through planning conditions or planning obligations such as Section 106 agreements. Site allocations that involve removing land from the Green Belt will provide compensatory improvements to the remaining Green Belt. The scope of compensatory improvements will also be informed through early engagement with relevant landowners, key stakeholders and the local community. Compensatory improvements to the environmental quality and accessibility of remaining Green Belt land may include:</p> <ul style="list-style-type: none"> • New or enhanced green infrastructure. • Woodland planting, examples include support for the Council's Carbon Capture Areas and Urban Tree Planting Strategy. • Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal); • Improvements to biodiversity, habitat connectivity and natural capital including schemes that can also enhance natural flood resilience by managing surface water run-off and improving drainage. • New or enhanced walking and cycle routes including contributions to schemes, such as the Staffordshire County Council Local Transport Plan, Walking and Cycling Infrastructure Plan and the Public Rights of Way Improvement Plan (all as updated); and • Improved access to new, enhanced or existing recreational and playing field provision for sites in the Green Belt identified in the Local Plan or Playing Pitch Strategy.
Attachments	1364617 Natural England.pdf
Comment ID	107
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM98
Q4page - Page	66/67 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13: Site Allocation
Q4policypara - Policy / Paragraph	BL18 Land at Clough Hall Supporting Text
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>BL18 – Clough Hall Playing Fields, Talke</p> <p>As previously stated in our 4th October 2024 response to the regulation 19 pre-submission draft Plan NE reference 486256. Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.</p> <p>Natural England note the following modifications and request formal consultation on the assessments detailed below;</p> <p>-</p>

	<p>'MM97' p141 Policy BL18 (Land at Clough Hall) Criterion 4 To amend criteria 4, as follows: ...including surface water flooding and sewer flooding. A site-specific Flood Risk Assessment and Drainage Strategy for the site should be prepared.</p> <p>-</p> <p>'MM98' p42 Paragraph 13.205 (supporting information to Policy BL18 Land at Clough Hall) To amend Paragraph 13.205, as follows: - To add additional text to the end of Paragraph 13.205: "...The sewers and risk of flooding will need careful assessment in the detailed design, masterplanning and drainage details for the site. Applicants should engage with relevant statutory undertakers, as appropriate".</p>
Attachments	1364617 Natural England.pdf
Comment ID	95
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM49
Q4page - Page	39 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4policypara - Policy / Paragraph	SE5 Supporting Text
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>Water Quality</p> <p>Natural England welcome the additions at 'MM49' which recognise that development proposals should have regard to impacts on linked catchments including but not limited to the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site. "MM49 To amend / add additional text to Paragraph 11.23, as follows: - "11.23.Relevant development proposals should have regard to Water Framework Directive catchment areas (in the North West / Humber catchment) and also River Basin Management Plans". (pg 85 of the PDF version Paragraph 11.23 (supporting information to Policy SE5 Water Resources and Water Quality)". Natural England welcome the following modifications which collectively support the commitments in Policy SE5 'MM45', 'MM45' and 'MM46' and 'MM47' relating to flooding, surface water sustainable drainage and water quality.</p>
Attachments	1364617 Natural England.pdf
Comment ID	116
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM90
Q4page - Page	61 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	SP11 Lyme Park

<p>Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.</p>	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>AB2 – Land Adjoining Corner of A500 and M6 Southbound</p> <p>Natural England note the proposed commitment to provide at least that 40% of this entirely green belt allocation site to strategic interconnected greenspaces.</p> <p>-</p> <p>‘MM67’ “Policy AB2 (Land at J16 of the M6) Provision of strategic and on plot landscaping of at least 40% of the total site area. To be delivered as green corridors across the site</p> <p>Natural England recommend that the design and future management of green and blue infrastructure is integral to site master planning for the benefit of people and nature.</p> <p>The relevant statutory agencies should be involved in master planning from the outset to ensure; the sustainable management of soils and water, alongside the creation of ecological corridors which consider / incorporate intact habitats and existing linkages and allow species to move and thrive.</p> <p>Natural England welcome ‘MM67’ criteria 13; to amend, by adding an additional sentence as follows: -</p> <p>“Travel Planning to the site should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531”</p> <p>Sites adjacent to ancient woodland and priority habitats.</p> <p>For sites adjacent to ancient woodland / priority habitats (including but not limited to the following sites) Natural England welcomes:</p> <p>-</p> <p>‘MM57’ 88-89 Policy SE11 To amend criteria 7, as follows: - Development proposals adjacent to existing woodlands should consider potential impacts and incorporate appropriate mitigation measures. This may include: establishing buffer zones, mitigating light pollution and ensuring that development does not disrupt the natural hydrological flows and connectivity between woodlands and watercourses</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p> <p>SP11 – Former Keele Municipal Golf Course</p> <p>MD29 - Land North of Bar Hill</p> <p>Natural England welcomes the following additions;</p> <p>- ‘MM87’ Policy MD29 (Land North of Bar Hill) To make the following updates to criteria ,7 and 8 of the policy:- 7. Any masterplanning work on the site should take into account the proximity of Bar Hill Ancient Woodland to the west of the site. A tree survey and an ecological survey should be undertaken to understand and mitigate any impacts on Ancient Woodland as appropriate.</p> <p>8. A tree survey should be prepared to identify trees subject to Tree Preservation Orders, as appropriate.</p> <p>LW53 – Land at Corner of Mucklestone Wood Land</p> <p>Natural England notes the following reference in ‘MM86’ and Natural England advises your authority that this Residential housing development proposal is located within the Impact Risk Zone (IRZ) of a protected site (Burnt Wood Site of Special Scientific interest / SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England:</p> <p>-</p> <p>‘MM86’ page129 “land contamination assessment and mitigation strategy in relation to impact of the former Tagedale Quarry landfill site” and the requirement for a “Submission of an appropriate assessment and mitigation strategy to prevent deterioration of the SPZ3 Bearstone Groundwater Protection Zone and protect controlled water receptors”</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A, admin note, see attachment).</p>
<p>Attachments</p>	<p>1364617 Natural England.pdf</p>
<p>Comment ID</p>	<p>100</p>
<p>Response Date</p>	<p>16/12/2025 14:33:00</p>
<p>Consultee Company / Organisation</p>	<p>Natural England</p>
<p>Consultee Position</p>	<p>Senior Officer</p>
<p>Consultee Family Name</p>	<p>McLaughlin</p>
<p>Consultee Given Name</p>	<p>Sally</p>
<p>Q4ref - MM Reference</p>	<p>MM45</p>
<p>Q4page - Page</p>	<p>31 of Modification Schedule</p>
<p>Q4chap - Chapter, Appendix Number or Map Inset</p>	<p>Chapter 11 Sustainable Environment</p>
<p>Q4policypara - Policy / Paragraph</p>	<p>SE3 Flood Risk Assessment Supporting Text</p>

Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>Water Quality</p> <p>Natural England welcome the additions at 'MM49' which recognise that development proposals should have regard to impacts on linked catchments including but not limited to the Humber Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site.</p> <p>"MM49 To amend / add additional text to Paragraph 11.23, as follows: - "11.23.Relevant development proposals should have regard to Water Framework Directive catchment areas (in the North West / Humber catchment) and also River Basin Management Plans". (pg 85 of the PDF version Paragraph 11.23 (supporting information to Policy SE5 Water Resources and Water Quality"</p> <p>Natural England welcome the following modifications which collectively support the commitments in Policy SE5 'MM45', 'MM45' and 'MM46' and 'MM47' relating to flooding, surface water sustainable drainage and water quality.</p>
Attachments	1364617 Natural England.pdf
Comment ID	104
Response Date	16/12/2025 14:33:00
Consultee Company / Organisation	Natural England
Consultee Position	Senior Officer
Consultee Family Name	McLaughlin
Consultee Given Name	Sally
Q4ref - MM Reference	MM60
Q4page - Page	43 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11: Sustainable Environment
Q4policypara - Policy / Paragraph	SE13 Soil and Agricultural Land
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above dated 05 November 2025, which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We understand that we are being consulted on the following documents:</p> <ul style="list-style-type: none"> •Schedule of Proposed Main Modifications •Main Modifications Sustainability Appraisal •Main Modifications Habitats Regulations Assessment •Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps <p>Natural England has reviewed these documents and only provided detailed comments on the proposed Main Modifications within our remit in relation to the natural environment.</p> <p>Soils and Agricultural Land</p> <p>Natural England note that 'MM60' Policy SE13 (Soil and Agricultural Land) recommends the following modification: To delete criteria 2. Proposals for development on BMV land (Grades 1, 2, and 3a) will only be supported where: a. There is an overriding need for the development that cannot be met on lower-quality land. b. It has been demonstrated that there are no suitable alternative sites on land of lower agricultural quality.</p> <p>Natural have previously advised the following with regards to plan policies relating to Soils:</p> <p>We strongly advise that at a minimum, the plan includes core policies for:</p> <ul style="list-style-type: none"> -the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and -for the protection of and sustainable management of soils as a resource for the future. <p>-Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).</p> <p>-Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.</p> <p>-Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).</p> <p>-Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.</p> <p>-Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.</p>

	<ul style="list-style-type: none"> -Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure). -Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed. -Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites -In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade) -Annex 1 provides further advice (admin note, see attachment)
Attachments	1364617 Natural England.pdf

Comment ID	48
Response Date	13/12/2025 10:14:00
Consultee Family Name	Moreau
Consultee Given Name	Jan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4polycypara - Policy / Paragraph	Policy PSD5: Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Main Modification MM08 appears to be incorrect. We believe that c. AB15 Land north of Vernon Avenue is actually a typo. It should read c. AB33 land off Park Lane as per Inspector Jordan previous correspondence with NULBC.
Comment ID	49
Response Date	13/12/2025 10:14:00
Consultee Family Name	Moreau
Consultee Given Name	Jan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	Page 46 of Modifications Shedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MAIN MODIFICATION MM67 relating to Policy AB2 – Land at Junction 16 of the M6.</p> <p>Criteria 1 New Requirement for a Masterplan led approach to the Plan, however, Key Environmental Impacts Are Missing</p> <p>MM67 requires a comprehensive masterplan and we welcome this, however, essential environmental considerations — particularly noise — are not included in the modification.</p> <p>This reveals that the allocation was not supported by a full understanding of its constraints.</p> <p>A masterplan required at Main Modifications stage indicates that the allocation was premature</p> <p>Noise Impacts – Essential Evidence Missing</p> <p>Although the Inspector has not explicitly referenced noise within Main Modification MM67, this does not remove noise from the scope of the examination.</p> <p>The allocation of AB2 depends on the promoter's technical evidence being robust. If the noise evidence is incomplete or inconsistent with BS4142 and NPPF §185, the modification cannot be considered sound.</p> <p>The Main Modifications consultation allows representations on whether MM67 is justified, effective, and aligned with national policy, so highlighting weaknesses in the noise evidence is directly relevant. The Indurent Noise Assessment carries no statutory weight and, when reviewed against BS4142 and NPPF §185, shows major shortcomings that undermine confidence in the allocation.</p> <p>Despite AB2 being an 80-hectare, 24-hour logistics and HGV site located close to homes such as The Mount on Moat Lane and properties on Park Lane noise is not addressed anywhere in MM67 and is not required within the mandatory masterplan. This is a significant omission because noise influences strategic decisions such as:</p> <ul style="list-style-type: none"> • Location of HGV yards • Orientation of loading bays • Need for acoustic bunds/barriers • Whether night operations are acceptable • Separation distances to villages <p>These are plan-level issues that cannot be deferred to planning applications. No strategic noise modelling or baseline assessment has been undertaken, leaving a critical evidence gap—particularly given the proximity of The Mount and other neighbouring properties on Park Lane and Moat Lane, the continuous operation of the site, and likely HGV idling, refrigeration units, and night loading noise.</p>

In the Traffic Assessment submitted by Indurent, there is too much reliance on the masking effects of the M6 and A500.

A policy that omits these environmental constraints is neither justified nor effective. Combined with unresolved transport impacts, the absence of strategic noise evidence means MM67 does not address the soundness concerns.

As modified, AB2 remains unjustified, ineffective, and inconsistent with national policy.

CRITERIA 3 - HGV Traffic and the Lorry Park – No Quantified Assessment.

Whilst MM67 strengthens security requirements for the lorry park, it still provides:

- No estimates of HGV movements
- No assessment of 24/7 operations
- No forecasted queueing or stack potential
- For a site of this scale, the absence of quantified traffic and HGV data is a fundamental evidence gap. Surely a Traffic Impact Assessment in addition to the micro-simulation is required

CRITERIA 7 Highways and Transport – Critical Unresolved Impacts

MM67 greatly expands Criterion 7 to require:

- “Suitable on- and off-site mitigation” for adverse impacts on M6 Junction 16 and on the local and strategic networks.
- A detailed micro-simulation model, agreed with National Highways, Staffordshire County Council and Cheshire East Council.
- Delivery of all mitigation identified through that future modelling.
- Ensuring such mitigation does not compromise site viability.

These additions confirm that:

- The highways evidence submitted at Examination was incomplete.
- The Council does not yet know whether AB2 can be safely or feasibly accommodated at J16.
- The plan is dependent on future modelling, contrary to NPPF paragraph 31.
- Key cross-boundary impacts remain unresolved.

This is not compatible with a sound Local Plan, which must contain allocations that are deliverable at the point of adoption.

Whilst we welcome Inspector Jordan’s instruction for a full micro-simulation involving National Highways, Staffordshire Highways and Cheshire East, it is essential that this work is based on current and accurate data. The figures used in the Indurent Transport Assessment are already out of date, and TRIS monitoring shows that previous forecasts have been significantly underestimated.

We also wish to highlight a further concern which has led to a recent FOI request to National Highways: TRIS monitoring data from devices , identification no.s 7539/1 and 7540/1, on the A500 near Junction 16 of the M6 has not been uploaded since August 2025. This prolonged absence of up-to-date traffic data is highly concerning and risks undermining the reliability of any assessment based upon it.

It is imperative that the micro-simulation results are made publicly available, and we respectfully request that Inspector Jordan does not issue her Final Report until this essential work has been completed and fully scrutinised.

There is a likely requirement for a Grade-Separated (Flyover) Junction and Viability Risks

The requirement for micro-simulation suggests that the scale of impact may be significant enough to require:

- Major slip-road reconfiguration
- New free-flow lanes
- A grade-separated structure (e.g., a flyover or underpass)

Typical UK costs for grade-separated motorway junction improvements range from £40m to over £100m.

We don’t believe any funding for such works is identified in the Local Plan, by National Highways, or by the local authorities.

The financial burden would therefore fall on the site promoter. If the microsimulation shows a major intervention is necessary, the cost could:

Undermine the viability of the AB2 project, lead to developer withdrawal or render the allocation undeliverable within the plan period and a Local Plan allocation that depends on unknown, potentially prohibitive costs is not sound

Criteria 9 – Landscape & Visual Impact

We support the requirement for a Landscape and Visual Impact Assessment as set out in AB2 paragraph 9 & 10.

However, there are two points we would like to make:

- The AB2 site rises towards the motorway, meaning the buildings would be highly visible to the M6 corridor, A500, and nearby villages. It would be extremely challenging to screen warehouses of 18-20 metres in height. Several nearby villages, including Alsagers Bank and Halmerend are actually on high ground meaning the warehouses are likely to be very visible across a wide area.
- The landscape impact would be severe and permanent, altering views into and out of Newcastle-under-Lyme.
- The gateway into the Borough, currently rural in character, would be transformed into an industrial environment.

Without proper assessment, the full visual impact on the surrounding landscape and communities cannot be understood or mitigated.

This raises serious concerns about the effectiveness and justification of the allocation and its consistency within the National Planning policy on protecting landscapes and visual amenity.

- In relation to paragraph 15, we object to the proposal to remove the substantial area of open green space between Public Footpaths Audley 9 and Audley 22 and replace it with narrow green corridors. Such corridors—confined between large warehouse buildings—would not enhance the experience of users of the public rights of way or workers in their rest periods. Moreover, they would result in the loss of habitat for farmland birds, which rely on open fields rather than enclosed, hedge-lined pathways between warehousing.

	<p>Criteria 13 - Public Transport Strategy</p> <p>These modifications confirm the site's poor location as the strengthened wording requires:</p> <ul style="list-style-type: none"> • New bus routes • Demand-responsive services • Long-term viability assessments • Cross-boundary integration • New cycle links and facilities <p>These demands confirm that AB2 is:</p> <ul style="list-style-type: none"> • Highly car-dependent • Poorly served by public transport • Likely to generate very high volumes of private car and HGV trips <p>This amplifies the traffic impact on J16 and rural settlements.</p> <p>The additional paragraph regarding SSSI sites on the A351 is supported; requiring Cheshire East and Staffordshire Highways to discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI sites</p> <p>However, it is necessary for the plan to set out how Cheshire East and Staffordshire Highways will actively discourage the routing of traffic—particularly HGVs. The required approach should be demonstrated before the Local Plan is adopted, so that the Inspector and stakeholders can be satisfied that the proposed measures are achievable and will provide genuine protection for these irreplaceable habitats.</p> <p>National policy requires plans to safeguard designated sites and avoid significant adverse effects at source; incorporating clear routing expectations for HGVs is therefore both appropriate and proportionate. We consider this necessary to ensure the Local Plan is effective, consistent with national policy, and therefore sound.</p> <p>CONCLUSION FOR MM67</p> <p>We feel that Main Modification MM67 does not make Policy AB2 sound as the modification:</p> <ul style="list-style-type: none"> • Relies on essential future highways modelling • Provides no funding or deliverability evidence for J16 mitigation • Ignores strategic noise impacts entirely • Requires a masterplan that is incomplete without noise • Reveals, rather than resolves, major uncertainties about the site's viability • Fails NPPF requirements for justification, effectiveness and environmental protection <p>We therefore respectfully request that the Inspector:</p> <ul style="list-style-type: none"> • Requires further modification to ensure that all essential evidence — including results, noise modelling, and costed mitigation — is completed before adoption, <p>OR</p> <p>Reconsiders the allocation and removes AB2 if these issues cannot be resolved.</p>
Comment ID	51
Response Date	13/12/2025 10:14:00
Consultee Family Name	Moreau
Consultee Given Name	Jan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM70
Q4page - Page	50 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB15 'land north of Vernon Avenue'
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MAIN MODIFICATION MM70 Policy AB15 – land north of Vernon Avenue</p> <p>We also wish to submit a formal objection to the proposed modifications to Policy AB15.</p> <p>The changes significantly weaken safeguards, reduce public protection, and fail to address critical risks. In its current form, AB15 is not sound, not justified, and not compliant with national policy.</p> <p>Ground Stability Risks Ignored</p> <p>Historic evidence and local knowledge indicate potential sub-surface instability linked to former mining activity. This presents significant risks of land failure, subsidence, construction delay, and major liability for the authority. Yet the revised Criterion 3 only requires a contamination assessment, not the geophysical or geotechnical investigations needed to identify mining-related voids or structural weaknesses. A site with unresolved ground stability risks cannot be considered deliverable, and this omission alone renders the allocation unsound,</p> <p>Removal of SA1 Protections</p> <p>Deleting the requirement to comply with Policy SA1 removes essential safeguards relating to access, heritage, landscape, environmental constraints, and infrastructure. This weakens oversight, shifts risk onto residents, and is not justified at a time when site-related risks are increasing.</p> <p>Heritage Safeguards Seriously Weakened</p> <p>Replacing the requirement to retain the medieval field system with simple "recording" permits irreversible loss of heritage assets. Recording is documentation of destruction, not mitigation, and conflicts with the</p>

	<p>NPPF and statutory heritage duties—especially when sub-surface features may relate to past mining or historic land use.</p> <p>Landscape Mitigation is Vague and Unenforceable</p> <p>Terms such as “landscape-led” or “not intrusive” have no measurable meaning. Without clear requirements (height limits, buffers, view protections), the policy lacks enforceability and leaves residents unprotected from harmful visual and environmental impacts.</p> <p>CONCLUSION – Policy AB15 Is Not Sound as</p> <p>The modifications dilute protections, ignore mining-related ground risks, weaken heritage safeguards, and rely on vague, unenforceable wording. The allocation should not progress until the following are secured:</p> <ul style="list-style-type: none"> • Full geotechnical and geophysical investigation (including GPR) • Archaeological desk-based and field evaluation • Restoration of strong heritage and landscape safeguards • Reinstatement of the general requirements previously covered by SA1 <p>Without these minimum measures, the allocation remains unsafe, unjustified, and unsound.</p> <p>Recent Approvals Undermine the Need for AB15</p> <p>In recent months, the council has approved a planning application for 39 dwellings at New Farm, Cross Lane, Audley—on green belt land. This approval directly reduces the identified housing shortfall that AB15 was intended to address. As such, the necessity for allocating AB15 is now weakened, and the strategic justification for its development is no longer robust. It is unreasonable and unsound to proceed with a high-risk allocation when recent permissions already help meet the area’s housing requirement.</p>
Comment ID	54
Response Date	13/12/2025 10:14:00
Consultee Family Name	Moreau
Consultee Given Name	Jan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM73
Q4page - Page	52 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy CT1 'Land at Red Street and High Carr Farm'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	We fully support the Inspector's modifications in deleting these sites from the Local Plan. If they had been allocated, this would have caused a great strain on our highways and other infrastructure.
Comment ID	52
Response Date	13/12/2025 10:14:00
Consultee Family Name	Moreau
Consultee Given Name	Jan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy AB12 (Land East of Diglake Street)
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	We fully support the Inspector's modifications in deleting these sites from the Local Plan. If they had been allocated, this would have caused a great strain on our highways and other infrastructure.

Comment ID	53
Response Date	13/12/2025 10:14:00
Consultee Family Name	Moreau
Consultee Given Name	Jan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM71
Q4page - Page	50 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB33 'Land off Nantwich Road / Park Lane'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	We fully support the Inspector's modifications in deleting these sites from the Local Plan. If they had been allocated, this would have caused a great strain on our highways and other infrastructure.

Comment ID	59
Response Date	13/12/2025 10:32:00
Consultee Family Name	Moreau
Consultee Given Name	Philip
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy AB12 'Land East of Diglake Street'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	We fully support the Inspector's modifications in deleting these sites from the Local Plan. If they had been allocated, this would have caused a great strain on our highways and other infrastructure.
Comment ID	58
Response Date	13/12/2025 10:32:00
Consultee Family Name	Moreau
Consultee Given Name	Philip
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM70
Q4page - Page	50 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	Policy AB15 'land north of Vernon Avenue'
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MAIN MODIFICATION MM70 Policy AB15 – land north of Vernon Avenue</p> <p>We also wish to submit a formal objection to the proposed modifications to Policy AB15.</p> <p>The changes significantly weaken safeguards, reduce public protection, and fail to address critical risks. In its current form, AB15 is not sound, not justified, and not compliant with national policy.</p> <p>Ground Stability Risks Ignored</p> <p>Historic evidence and local knowledge indicate potential sub-surface instability linked to former mining activity. This presents significant risks of land failure, subsidence, construction delay, and major liability for the authority. Yet the revised Criterion 3 only requires a contamination assessment, not the geophysical or geotechnical investigations needed to identify mining-related voids or structural weaknesses. A site with unresolved ground stability risks cannot be considered deliverable, and this omission alone renders the allocation unsound,</p> <p>Removal of SA1 Protections</p> <p>Deleting the requirement to comply with Policy SA1 removes essential safeguards relating to access, heritage, landscape, environmental constraints, and infrastructure. This weakens oversight, shifts risk onto residents, and is not justified at a time when site-related risks are increasing.</p> <p>Heritage Safeguards Seriously Weakened</p> <p>Replacing the requirement to retain the medieval field system with simple “recording” permits irreversible loss of heritage assets. Recording is documentation of destruction, not mitigation, and conflicts with the NPPF and statutory heritage duties—especially when sub-surface features may relate to past mining or historic land use.</p> <p>Landscape Mitigation is Vague and Unenforceable</p> <p>Terms such as “landscape-led” or “not intrusive” have no measurable meaning. Without clear requirements (height limits, buffers, view protections), the policy lacks enforceability and leaves residents unprotected from harmful visual and environmental impacts.</p> <p>CONCLUSION – Policy AB15 Is Not Sound as</p>

	<p>The modifications dilute protections, ignore mining-related ground risks, weaken heritage safeguards, and rely on vague, unenforceable wording. The allocation should not progress until the following are secured:</p> <ul style="list-style-type: none"> • Full geotechnical and geophysical investigation (including GPR) • Archaeological desk-based and field evaluation • Restoration of strong heritage and landscape safeguards • Reinstatement of the general requirements previously covered by SA1 <p>Without these minimum measures, the allocation remains unsafe, unjustified, and unsound.</p> <p>Recent Approvals Undermine the Need for AB15</p> <p>In recent months, the council has approved a planning application for 39 dwellings at New Farm, Cross Lane, Audley—on green belt land. This approval directly reduces the identified housing shortfall that AB15 was intended to address. As such, the necessity for allocating AB15 is now weakened, and the strategic justification for its development is no longer robust. It is unreasonable and unsound to proceed with a high-risk allocation when recent permissions already help meet the area's housing requirement.</p>
Comment ID	56
Response Date	13/12/2025 10:32:00
Consultee Family Name	Moreau
Consultee Given Name	Philip
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	Policy PSD5: Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Main Modification MM08 appears to be incorrect. We believe that c. AB15 Land north of Vernon Avenue is actually a typo. It should read c. AB33 land off Park Lane as per Inspector Jordan previous correspondence with NULBC.
Comment ID	60
Response Date	13/12/2025 10:32:00
Consultee Family Name	Moreau
Consultee Given Name	Philip
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM71
Q4page - Page	50 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB33 'Land off Nantwich Road / Park Lane'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	We fully support the Inspector's modifications in deleting these sites from the Local Plan. If they had been allocated, this would have caused a great strain on our highways and other infrastructure.
Comment ID	57
Response Date	13/12/2025 10:32:00
Consultee Family Name	Moreau
Consultee Given Name	Philip

Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>MAIN MODIFICATION MM67 relating to Policy AB2 – Land at Junction 16 of the M6.</p> <p>Criteria 1 New Requirement for a Masterplan led approach to the Plan, however, Key Environmental Impacts Are Missing</p> <p>MM67 requires a comprehensive masterplan and we welcome this, however, essential environmental considerations — particularly noise — are not included in the modification.</p> <p>This reveals that the allocation was not supported by a full understanding of its constraints.</p> <p>A masterplan required at Main Modifications stage indicates that the allocation was premature</p> <p>Noise Impacts – Essential Evidence Missing</p> <p>Although the Inspector has not explicitly referenced noise within Main Modification MM67, this does not remove noise from the scope of the examination.</p> <p>The allocation of AB2 depends on the promoter's technical evidence being robust. If the noise evidence is incomplete or inconsistent with BS4142 and NPPF §185, the modification cannot be considered sound.</p> <p>The Main Modifications consultation allows representations on whether MM67 is justified, effective, and aligned with national policy, so highlighting weaknesses in the noise evidence is directly relevant. The Indurent Noise Assessment carries no statutory weight and, when reviewed against BS4142 and NPPF §185, shows major shortcomings that undermine confidence in the allocation.</p> <p>Despite AB2 being an 80-hectare, 24-hour logistics and HGV site located close to homes such as The Mount on Moat Lane and properties on Park Lane noise is not addressed anywhere in MM67 and is not required within the mandatory masterplan. This is a significant omission because noise influences strategic decisions such as:</p> <ul style="list-style-type: none"> • Location of HGV yards • Orientation of loading bays • Need for acoustic bunds/barriers • Whether night operations are acceptable • Separation distances to villages <p>These are plan-level issues that cannot be deferred to planning applications. No strategic noise modelling or baseline assessment has been undertaken, leaving a critical evidence gap—particularly given the proximity of The Mount and other neighbouring properties on Park Lane and Moat Lane, the continuous operation of the site, and likely HGV idling, refrigeration units, and night loading noise.</p> <p>In the Traffic Assessment submitted by Indurent, there is too much reliance on the masking effects of the M6 and A500.</p> <p>A policy that omits these environmental constraints is neither justified nor effective. Combined with unresolved transport impacts, the absence of strategic noise evidence means MM67 does not address the soundness concerns.</p> <p>As modified, AB2 remains unjustified, ineffective, and inconsistent with national policy.</p> <p>CRITERIA 3 - HGV Traffic and the Lorry Park – No Quantified Assessment.</p> <p>Whilst MM67 strengthens security requirements for the lorry park, it still provides:</p> <ul style="list-style-type: none"> • No estimates of HGV movements • No assessment of 24/7 operations • No forecasted queueing or stack potential • For a site of this scale, the absence of quantified traffic and HGV data is a fundamental evidence gap. Surely a Traffic Impact Assessment in addition to the micro-simulation is required <p>CRITERIA 7 Highways and Transport – Critical Unresolved Impacts</p> <p>MM67 greatly expands Criterion 7 to require:</p> <ul style="list-style-type: none"> • “Suitable on- and off-site mitigation” for adverse impacts on M6 Junction 16 and on the local and strategic networks. • A detailed micro-simulation model, agreed with National Highways, Staffordshire County Council and Cheshire East Council. • Delivery of all mitigation identified through that future modelling. • Ensuring such mitigation does not compromise site viability. <p>These additions confirm that:</p> <ul style="list-style-type: none"> • The highways evidence submitted at Examination was incomplete. • The Council does not yet know whether AB2 can be safely or feasibly accommodated at J16. • The plan is dependent on future modelling, contrary to NPPF paragraph 31. • Key cross-boundary impacts remain unresolved. <p>This is not compatible with a sound Local Plan, which must contain allocations that are deliverable at the point of adoption.</p> <p>Whilst we welcome Inspector Jordan's instruction for a full micro-simulation involving National Highways, Staffordshire Highways and Cheshire East, it is essential that this work is based on current and accurate data. The figures used in the Indurent Transport Assessment are already out of date, and TRIS monitoring shows that previous forecasts have been significantly underestimated.</p> <p>We also wish to highlight a further concern which has led to a recent FOI request to National Highways: TRIS monitoring data from devices , identification no.s 7539/1 and 7540/1, on the A500 near Junction</p>

16 of the M6 has not been uploaded since August 2025. This prolonged absence of up-to-date traffic data is highly concerning and risks undermining the reliability of any assessment based upon it. It is imperative that the micro-simulation results are made publicly available, and we respectfully request that Inspector Jordan does not issue her Final Report until this essential work has been completed and fully scrutinised.

There is a likely requirement for a Grade-Separated (Flyover) Junction and Viability Risks

The requirement for micro-simulation suggests that the scale of impact may be significant enough to require:

- Major slip-road reconfiguration
- New free-flow lanes
- A grade-separated structure (e.g., a flyover or underpass)

Typical UK costs for grade-separated motorway junction improvements range from £40m to over £100m.

We don't believe any funding for such works is identified in the Local Plan, by National Highways, or by the local authorities.

The financial burden would therefore fall on the site promoter. If the microsimulation shows a major intervention is necessary, the cost could:

Undermine the viability of the AB2 project, lead to developer withdrawal or render the allocation undeliverable within the plan period and a Local Plan allocation that depends on unknown, potentially prohibitive costs is not sound

Criteria 9 – Landscape & Visual Impact

We support the requirement for a Landscape and Visual Impact Assessment as set out in AB2 paragraph 9 & 10.

However, there are two points we would like to make:

- The AB2 site rises towards the motorway, meaning the buildings would be highly visible to the M6 corridor, A500, and nearby villages. It would be extremely challenging to screen warehouses of 18-20 metres in height. Several nearby villages, including Alsagers Bank and Halmerend are actually on high ground meaning the warehouses are likely to be very visible across a wide area.
- The landscape impact would be severe and permanent, altering views into and out of Newcastle-under-Lyme.
- The gateway into the Borough, currently rural in character, would be transformed into an industrial environment.

Without proper assessment, the full visual impact on the surrounding landscape and communities cannot be understood or mitigated.

This raises serious concerns about the effectiveness and justification of the allocation and its consistency within the National Planning policy on protecting landscapes and visual amenity.

- In relation to paragraph 15, we object to the proposal to remove the substantial area of open green space between Public Footpaths Audley 9 and Audley 22 and replace it with narrow green corridors. Such corridors—confined between large warehouse buildings—would not enhance the experience of users of the public rights of way or workers in their rest periods. Moreover, they would result in the loss of habitat for farmland birds, which rely on open fields rather than enclosed, hedge-lined pathways between warehousing.

Criteria 13 - Public Transport Strategy

These modifications confirm the site's poor location as the strengthened wording requires:

- New bus routes
- Demand-responsive services
- Long-term viability assessments
- Cross-boundary integration
- New cycle links and facilities

These demands confirm that AB2 is:

- Highly car-dependent
- Poorly served by public transport
- Likely to generate very high volumes of private car and HGV trips

This amplifies the traffic impact on J16 and rural settlements.

The additional paragraph regarding SSSI sites on the A351 is supported; requiring Cheshire East and Staffordshire Highways to discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI sites

However, it is necessary for the plan to set out how Cheshire East and Staffordshire Highways will actively discourage the routing of traffic—particularly HGVs. The required approach should be demonstrated before the Local Plan is adopted, so that the Inspector and stakeholders can be satisfied that the proposed measures are achievable and will provide genuine protection for these irreplaceable habitats.

National policy requires plans to safeguard designated sites and avoid significant adverse effects at source; incorporating clear routing expectations for HGVs is therefore both appropriate and proportionate. We consider this necessary to ensure the Local Plan is effective, consistent with national policy, and therefore sound.

CONCLUSION FOR MM67

We feel that Main Modification MM67 does not make Policy AB2 sound as the modification:

- Relies on essential future highways modelling
- Provides no funding or deliverability evidence for J16 mitigation
- Ignores strategic noise impacts entirely
- Requires a masterplan that is incomplete without noise
- Reveals, rather than resolves, major uncertainties about the site's viability
- Fails NPPF requirements for justification, effectiveness and environmental protection

We therefore respectfully request that the Inspector:

- Requires further modification to ensure that all essential evidence — including results, noise modelling, and costed mitigation — is completed before adoption,

	OR Reconsiders the allocation and removes AB2 if these issues cannot be resolved.
Comment ID	61
Response Date	13/12/2025 10:32:00
Consultee Family Name	Moreau
Consultee Given Name	Philip
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM73
Q4page - Page	52 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy CT1 'Land at Red Street and High Carr Farm'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	We fully support the Inspector's modifications in deleting these sites from the Local Plan. If they had been allocated, this would have caused a great strain on our highways and other infrastructure.

Comment ID	159
Response Date	17/12/2025 10:21:00
Consultee Family Name	Nelson
Consultee Given Name	Alison
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I welcome the Planning Inspector's serious concerns about the scale of this development at the busy junction of the M6 and the A500 and support the need for a micro simulation model of the impact on our highways (AB2 para7) but feel that as the access needed is likely to be a flyover with the cost of this potentially impacting the viability of the site that this micro simulation should be undertaken BEFORE the adoption of the Local Plan. It is important to recognise the scale of the current problems and that traffic figures submitted by the developers are way out of date, and their projections will be severely under estimated. Already it is now a regular occurrence that traffic queuing up to the M6/A500 roundabout come off early at the Audley slip road resulting in local roads and lanes being inundated with traffic that they are just not suited for. This junction has also become a local accident hotspot. I would also like clarification on the emergency use of Moat Lane - will it be limited to emergency vehicles and not HGVs and employee's cars when the A500 access is busy, and how will this be policed on a day to day basis? Likewise, (AB2 para 13) how will the developers discourage routing of traffic past Black Firs and Craddock's Moss SSSIs? This should have to be shown BEFORE the Local Plan is adopted to ensure the protection of these special nature sites. Whilst I support the requirement for a landscape and visual impact assessment (AB2 - para9) the removal of large green spaces between footpaths will not enhance public rights of way and will lead to loss of habitat of farmland birds who need open fields not hedge lined footpaths</p>

Comment ID	180
Response Date	17/12/2025 11:55:00
Consultee Family Name	Newman
Consultee Given Name	Geraldine
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD5 Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>TO WHOM IT MAY CONCERN:</p> <p>I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>I fully support a number of modifications that directly benefit Audley Parish. Modification MM69, which removes the allocation of AB12 (Land East of Diglake Street), as the proposed 125 dwellings would have imposed unsustainable pressure on local infrastructure, highways, and the surrounding Green Belt landscape.</p> <p>I also support Modification MM08, which removes site CT1 (Land at Red Street and High Carr Farm). This change avoids the significant transport and environmental impacts that would have arisen from the 530 dwellings initially proposed, added to which Modification MM05, which reduces the overall housing requirement for Audley and Bignall End from 250 to 110 dwellings, reflects the removal of these sites and will help to protect the rural character and environmental quality of the area.</p> <p>I'm not happy that the proposed housing sites in the Audley area are proceeding as I do not believe this in any way reflects the views of residents and does nothing to keep its rural character.</p> <p>My on-going deep concerns relate to the continued inclusion of AB2 (Land at Junction 16 of the M6) within the Local Plan. Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues previously identified by the Inspector during examination.</p> <p>Serious concerns remain regarding the scale of the development, the lack of complete and up-to-date highways evidence, the uncertainty surrounding deliverability, and the absence of clarity regarding required mitigation. In addition, MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the retention of AB2 in the Plan is premature, unjustified, and insufficiently evidenced. The site should not be included until all outstanding matters are fully addressed.</p> <p>Although the modifications require micro-simulation transport modelling (as part of MM67), I am unhappy that this is not required to be completed before the Local Plan is adopted. Access to AB2 is highly likely to necessitate a grade-separated flyover, given that every Staffordshire junction on the A500 is grade-separated other than the large roundabout at the M6. A scheme of this scale would involve substantial infrastructure investment, creating significant viability implications that have not yet been tested or published.</p>

Apparently the transport data currently relied upon is considerably out of date and does not reflect the daily congestion, queuing, and hazards experienced on the A500, its slip roads, or the rural road network through the Audley parish.

Surely, without complete and robust transport modelling, it is not possible to consider AB2 sound or deliverable?

I would also like to bring to your attention my concerns regarding the reference to “emergency access” via Moat Lane within the amended policy. MM67 requires clarification on this point, but none has been provided. Any reference to emergency access must clearly state that Moat Lane is to be used strictly for blue-light emergency vehicles only, and not for HGVs, employee vehicles, or diverted traffic in the event that primary access from the A500 becomes unavailable. Without explicit wording in the modification text, the risk of unintended and inappropriate traffic displacement remains high and unacceptable.

In addition MM67 refers to measures intended to “discourage” the routing of traffic near Black Firs and Craddock’s Moss SSSIs. While this is welcome in principle, the modification provides no detail as to what these measures are, how they will operate, or how they will prevent HGVs and commercial traffic from impacting these sensitive ecological sites. Given their importance, such measures must be defined, tested, and presented before the Local Plan is adopted and whereas the strengthened requirement for a landscape and visual impact assessment within MM67 are welcomed, I strongly disagree to the replacement of the existing large area of open green space between footpaths Audley 9 and Audley 22 with narrow “green corridors”. These corridors, enclosed by substantial warehouse buildings, cannot replicate the value of open green space in terms of biodiversity, landscape character, or public amenity. They will not support farmland birds that rely on open fields for survival, nor will they provide the recreational or environmental quality currently offered by the open landscape. This modification undermines the principle of a landscape-led masterplan and should be revised immediately.

Due to the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her Final Report and resist progressing any planning applications relating to AB2 until all highways modelling is fully completed and published, all required mitigation is costed and independently reviewed, viability is reassessed in light of potentially significant infrastructure requirements, and full community and stakeholder consultation has taken place on the finalised evidence - all of which must be evidenced if we/you are to ensure viability, effectiveness, and just as important, deliverability, of any future development proposal.

Comment ID	131
Response Date	17/12/2025 11:55:00
Consultee Family Name	Newman
Consultee Given Name	Geraldine
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 'land at J16 of the M6'

Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.

TO WHOM IT MAY CONCERN:

I am writing to submit my comments on the Main Modifications to the Newcastle-under-Lyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.

I fully support a number of modifications that directly benefit Audley Parish. Modification MM69, which removes the allocation of AB12 (Land East of Diglake Street), as the proposed 125 dwellings would have imposed unsustainable pressure on local infrastructure, highways, and the surrounding Green Belt landscape.

I also support Modification MM08, which removes site CT1 (Land at Red Street and High Carr Farm). This change avoids the significant transport and environmental impacts that would have arisen from the 530 dwellings initially proposed, added to which Modification MM05, which reduces the overall housing requirement for Audley and Bignall End from 250 to 110 dwellings, reflects the removal of these sites and will help to protect the rural character and environmental quality of the area.

I'm not happy that the proposed housing sites in the Audley area are proceeding as I do not believe this in any way reflects the views of residents and does nothing to keep its rural character.

My on-going deep concerns relate to the continued inclusion of AB2 (Land at Junction 16 of the M6) within the Local Plan. Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues previously identified by the Inspector during examination.

Serious concerns remain regarding the scale of the development, the lack of complete and up-to-date highways evidence, the uncertainty surrounding deliverability, and the absence of clarity regarding required mitigation. In addition, MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the retention of AB2 in the Plan is premature, unjustified, and insufficiently evidenced. The site should not be included until all outstanding matters are fully addressed.

Although the modifications require micro-simulation transport modelling (as part of MM67), I am unhappy that this is not required to be completed **before** the Local Plan is adopted. Access to AB2 is highly likely to necessitate a grade-separated flyover, given that every Staffordshire junction on the A500 is grade-separated other than the large roundabout at the M6. A scheme of this scale would involve substantial infrastructure investment, creating significant viability implications that have not yet been tested or published.

Apparently the transport data currently relied upon is considerably out of date and does not reflect the daily congestion, queuing, and hazards experienced on the A500, its slip roads, or the rural road network through the Audley parish.

Surely, without complete and robust transport modelling, it is not possible to consider AB2 sound or deliverable?

I would also like to bring to your attention my concerns regarding the reference to "emergency access" via Moat Lane within the amended policy. MM67 requires clarification on this point, but none has been provided. Any reference to emergency access must clearly state that Moat Lane is to be used strictly for blue-light emergency vehicles only, and not for HGVs, employee vehicles, or diverted traffic in the event that primary access from the A500 becomes unavailable. Without explicit wording in the modification

text, the risk of unintended and inappropriate traffic displacement remains high and unacceptable.

In addition MM67 refers to measures intended to “discourage” the routing of traffic near Black Firs and Craddock’s Moss SSSIs. While this is welcome in principle, the modification provides no detail as to what these measures are, how they will operate, or how they will prevent HGVs and commercial traffic from impacting these sensitive ecological sites. Given their importance, such measures must be defined, tested, and presented before the Local Plan is adopted and whereas the strengthened requirement for a landscape and visual impact assessment within MM67 are welcomed, I strongly disagree to the replacement of the existing large area of open green space between footpaths Audley 9 and Audley 22 with narrow “green corridors”. These corridors, enclosed by substantial warehouse buildings, cannot replicate the value of open green space in terms of biodiversity, landscape character, or public amenity. They will not support farmland birds that rely on open fields for survival, nor will they provide the recreational or environmental quality currently offered by the open landscape. This modification undermines the principle of a landscape-led masterplan and should be revised immediately.

Due to the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her Final Report and resist progressing any planning applications relating to AB2 until all highways modelling is fully completed and published, all required mitigation is costed and independently reviewed, viability is reassessed in light of potentially significant infrastructure requirements, and full community and stakeholder consultation has taken place on the finalised evidence - all of which must be evidenced if we/you are to ensure viability, effectiveness, and just as important, deliverability, of any future development proposal.

Comment ID	179
Response Date	17/12/2025 11:55:00
Consultee Family Name	Newman
Consultee Given Name	Geraldine
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM05
Q4page - Page	7 of Modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD3 Distribution of Development
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>TO WHOM IT MAY CONCERN:</p> <p>I am writing to submit my comments on the Main Modifications to the Newcastle-underLyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>I fully support a number of modifications that directly benefit Audley Parish. Modification MM69, which removes the allocation of AB12 (Land East of Diglake Street), as the proposed 125 dwellings would have imposed unsustainable pressure on local infrastructure, highways, and the surrounding Green Belt landscape.</p>

I also support Modification MM08, which removes site CT1 (Land at Red Street and High Carr Farm). This change avoids the significant transport and environmental impacts that would have arisen from the 530 dwellings initially proposed, added to which Modification MM05, which reduces the overall housing requirement for Audley and Bignall End from 250 to 110 dwellings, reflects the removal of these sites and will help to protect the rural character and environmental quality of the area.

I'm not happy that the proposed housing sites in the Audley area are proceeding as I do not believe this in any way reflects the views of residents and does nothing to keep its rural character.

My on-going deep concerns relate to the continued inclusion of AB2 (Land at Junction 16 of the M6) within the Local Plan. Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve the substantial issues previously identified by the Inspector during examination.

Serious concerns remain regarding the scale of the development, the lack of complete and upto-date highways evidence, the uncertainty surrounding deliverability, and the absence of clarity regarding required mitigation. In addition, MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the retention of AB2 in the Plan is premature, unjustified, and insufficiently evidenced. The site should not be included until all outstanding matters are fully addressed.

Although the modifications require micro-simulation transport modelling (as part of MM67), I am unhappy that this is not required to be completed **before** the Local Plan is adopted. Access to AB2 is highly likely to necessitate a grade-separated flyover, given that every Staffordshire junction on the A500 is grade-separated other than the large roundabout at the M6. A scheme of this scale would involve substantial infrastructure investment, creating significant viability implications that have not yet been tested or published.

Apparently the transport data currently relied upon is considerably out of date and does not reflect the daily congestion, queuing, and hazards experienced on the A500, its slip roads, or the rural road network through the Audley parish.

Surely, without complete and robust transport modelling, it is not possible to consider AB2 sound or deliverable?

I would also like to bring to your attention my concerns regarding the reference to "emergency access" via Moat Lane within the amended policy. MM67 requires clarification on this point, but none has been provided. Any reference to emergency access must clearly state that Moat Lane is to be used strictly for blue-light emergency vehicles only, and not for HGVs, employee vehicles, or diverted traffic in the event that primary access from the A500 becomes unavailable. Without explicit wording in the modification text, the risk of unintended and inappropriate traffic displacement remains high and unacceptable.

In addition MM67 refers to measures intended to "discourage" the routing of traffic near Black Firs and Craddock's Moss SSSIs. While this is welcome in principle, the modification provides no detail as to what these measures are, how they will operate, or how they will prevent HGVs and commercial traffic from impacting these sensitive ecological sites. Given their importance, such measures must be defined, tested, and presented before the Local Plan is adopted and whereas the strengthened requirement for a landscape and visual impact assessment within MM67 are welcomed, I strongly disagree to the replacement of the existing large area of open green space between

footpaths Audley 9 and Audley 22 with narrow “green corridors”. These corridors, enclosed by substantial warehouse buildings, cannot replicate the value of open green space in terms of biodiversity, landscape character, or public amenity. They will not support farmland birds that rely on open fields for survival, nor will they provide the recreational or environmental quality currently offered by the open landscape. This modification undermines the principle of a landscape-led masterplan and should be revised immediately.

Due to the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her Final Report and resist progressing any planning applications relating to AB2 until all highways modelling is fully completed and published, all required mitigation is costed and independently reviewed, viability is reassessed in light of potentially significant infrastructure requirements, and full community and stakeholder consultation has taken place on the finalised evidence - all of which must be evidenced if we/you are to ensure viability, effectiveness, and just as important, deliverability, of any future development proposal.

Comment ID	178
Response Date	17/12/2025 11:55:00
Consultee Family Name	Newman
Consultee Given Name	Geraldine
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB12 'land east of Diglake Street'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>TO WHOM IT MAY CONCERN:</p> <p>I am writing to submit my comments on the Main Modifications to the Newcastle-underLyme Local Plan. In accordance with the consultation guidance, this representation relates only to the proposed modifications and not to matters previously considered at the Regulation 19 stage.</p> <p>I fully support a number of modifications that directly benefit Audley Parish. Modification MM69, which removes the allocation of AB12 (Land East of Diglake Street), as the proposed 125 dwellings would have imposed unsustainable pressure on local infrastructure, highways, and the surrounding Green Belt landscape.</p> <p>I also support Modification MM08, which removes site CT1 (Land at Red Street and High Carr Farm). This change avoids the significant transport and environmental impacts that would have arisen from the 530 dwellings initially proposed, added to which Modification MM05, which reduces the overall housing requirement for Audley and Bignall End from 250 to 110 dwellings, reflects the removal of these sites and will help to protect the rural character and environmental quality of the area.</p> <p>I'm not happy that the proposed housing sites in the Audley area are proceeding as I do not believe this in any way reflects the views of residents and does nothing to keep its rural character.</p> <p>My on-going deep concerns relate to the continued inclusion of AB2 (Land at Junction 16 of the M6) within the Local Plan. Modifications MM67 and MM68 amend the policy and supporting text; however, they do not resolve</p>

the substantial issues previously identified by the Inspector during examination.

Serious concerns remain regarding the scale of the development, the lack of complete and upto-date highways evidence, the uncertainty surrounding deliverability, and the absence of clarity regarding required mitigation. In addition, MM66, which removes Policy SA1, further weakens the policy framework surrounding AB2. As a result, the retention of AB2 in the Plan is premature, unjustified, and insufficiently evidenced. The site should not be included until all outstanding matters are fully addressed.

Although the modifications require micro-simulation transport modelling (as part of MM67), I am unhappy that this is not required to be completed **before** the Local Plan is adopted. Access to AB2 is highly likely to necessitate a grade-separated flyover, given that every Staffordshire junction on the A500 is grade-separated other than the large roundabout at the M6. A scheme of this scale would involve substantial infrastructure investment, creating significant viability implications that have not yet been tested or published.

Apparently the transport data currently relied upon is considerably out of date and does not reflect the daily congestion, queuing, and hazards experienced on the A500, its slip roads, or the rural road network through the Audley parish.

Surely, without complete and robust transport modelling, it is not possible to consider AB2 sound or deliverable?

I would also like to bring to your attention my concerns regarding the reference to “emergency access” via Moat Lane within the amended policy. MM67 requires clarification on this point, but none has been provided. Any reference to emergency access must clearly state that Moat Lane is to be used strictly for blue-light emergency vehicles only, and not for HGVs, employee vehicles, or diverted traffic in the event that primary access from the A500 becomes unavailable. Without explicit wording in the modification text, the risk of unintended and inappropriate traffic displacement remains high and unacceptable.

In addition MM67 refers to measures intended to “discourage” the routing of traffic near Black Firs and Craddock’s Moss SSSIs. While this is welcome in principle, the modification provides no detail as to what these measures are, how they will operate, or how they will prevent HGVs and commercial traffic from impacting these sensitive ecological sites. Given their importance, such measures must be defined, tested, and presented before the Local Plan is adopted and whereas the strengthened requirement for a landscape and visual impact assessment within MM67 are welcomed, I strongly disagree to the replacement of the existing large area of open green space between footpaths Audley 9 and Audley 22 with narrow “green corridors”. These corridors, enclosed by substantial warehouse buildings, cannot replicate the value of open green space in terms of biodiversity, landscape character, or public amenity. They will not support farmland birds that rely on open fields for survival, nor will they provide the recreational or environmental quality currently offered by the open landscape. This modification undermines the principle of a landscape-led masterplan and should be revised immediately.

Due to the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her Final Report and resist progressing any planning applications relating to AB2 until all highways modelling is fully completed and published, all required mitigation is costed and independently reviewed, viability is reassessed in light of potentially significant infrastructure requirements, and full community and stakeholder consultation has taken place on the finalised evidence - all of

which must be evidenced if we/you are to ensure viability, effectiveness, and just as important, deliverability, of any future development proposal.

Comment ID	165
Response Date	17/12/2025 10:28:00
Consultee Family Name	Nix
Consultee Given Name	Ruth
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2: Land at Junction 16 of the M6 Motorway
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>To whom it may concern:</p> <p>Reg 19 draft local plan.</p> <p>Ref:MM67 policy AB2 land at Junction 16 of the M6 motorway.</p> <p>I am concerned about the size of this development with large warehouses as well as offices and a 200 place lorry park.</p> <p>It is best to a very busy junction of the M6 and there are queues of traffic going towards the M6 every day. I use this route regularly. I understand that a proposed access might include a flyover which would be considerably expensive. This might allay the congestion that's already there somewhat, which will increase if this site is develop developed as planned. I don't believe the figures for traffic are up to date and might give false assurance. Also there are already warehouses vacant in the area and also office spaces. I am not convinced that the demand is high as proposed. A a review of the of a flyover & the Traffic figures, should be implemented before the Local Plan is adopted. This is already a very busy roundabout.</p> <p>I regularly travel from that Junction on to the M6 south. As there is usually a lot of traffic, I have to wait behind the traffic going straight on or to the right because there is no left-hand lane. At busy times this can take awhile. Also, if there are any accidents near the Audley turn off which there have been quite a few this also causes a lot of congestion. This is before any proposed development might take place on the site.</p> <p>I'm also concerned that the recent approval of 39 executive type homes at New Farm, Cross Lane, Audley has contributed to the local housing supply, therefore reducing the need for AB15.</p> <p>Removing SA1 deletes some essential protections.</p>

Comment ID	12
Response Date	04/12/2025 09:15:00
Consultee Company / Organisation	Aspire Housing Association Ltd
Consultee Family Name	Nolan
Consultee Given Name	Graham
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	81
Q4page - Page	57
Q4policypara - Policy / Paragraph	KS3 Land at Blackbank Road
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We do not feel the deletion of KS3 / Blackbank Road, Knutton from the local plan is sound as: KS3 is an established key priority site for housing development in the Knutton Town Deal masterplan and Newcastle under Lyme Town Investment Plan. It is and evidenced by its inclusion, and the process of its inclusion in the masterplan, able to deliver against objectively assessed needs and can deliver sustainable development, contributing to the current housing and community infrastructure investment as part of the regeneration of Knutton. It is readily developable as the sports pitches previously present on site have been relocated to a nearby site ("The Whammy") in readiness for development with the established strategy to begin to develop the site for predominantly open market homes, with a positive land value.</p> <p>The site KS3 (land at Blackbank Rd, Knutton) is part of a comprehensive masterplan for the regeneration of Knutton Village which is now well underway in terms of physical development. It is an integral part of the Town Deal Business Case. The vision and objectives explicitly reference the Blackbank Road site contributing to c210 new homes. Furthermore, the development of the nearby Whammy sports facilities was developed and funded on the basis that Blackbank Road would be used to provide much needed homes (including relocation of sports pitches on Blackbank Rd to facilitate housing development).</p> <p>Blackbank Road is cited within the business case document "the delivery of homes at Blackbank Road and High Street/Acacia Avenue and homes at the former Knutton Community Centre site in 2024/25 will help the Borough Council to meet its challenging five-year housing target and address the area's identified housing needs"</p> <p>The potential removal of the site from the local plan not only reduces the potential for new, much needed homes but also undermines the recent investment in community facilities, enterprise units and new build regeneration schemes aimed at bringing the village of Knutton back to life. The importance of which was recognised by the Knutton masterplan and subsequent Town deal funding.</p> <p>Knutton also forms part of the Newcastle-under-Lyme Borough Council and the Town Deal Board's Town Investment Plan 2021 for Newcastle-under-Lyme to Government. Within this submission "Putting the heart back into Knutton village – a programme of investment to enable the development of key strategic housing sites within the Knutton masterplan, bringing forward 282 new houses, 25% of which would be socially rented is a clear priority.</p> <p>The Town deal programme has always included development of the KS3 /Blackbank Road site following completion of the nearby affordable housing sites (now in construction stage and due to complete September 2026) and associated community and commercial Town deal projects (now completed) making Knutton and the site even more attractive to Developers. The site has received technical due diligence and indicative layouts developed as part of the masterplan and town deal process and recognised as a key component of the overall strategy to deliver housing in Knutton as part of the regeneration of the area. The site has had external RICs valuation providing a positive land value.</p> <p>The site owner, Staffordshire County Council, have, as part of the Town Deal process provided formal written support to partners for the regeneration of the Knutton area via the Knutton Masterplan and the priorities of the Newcastle-under-Lyme Town Deal including the disposal and development of the Blackbank Road site.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised	Reinstatement of KS3 (land at Blackbank Rd, Knutton) into the local plan as per previous.

wording of any policy or text. Please be as precise as possible.	
Attachments	Newcastle-under-Lyme Town Investment Plan.pdf Knutton Town Deal.pdf

Comment ID	137
Response Date	17/12/2025 13:56:00
Consultee Company / Organisation	Cheshire East Council
Consultee Position	Strategic Planning Team Leader
Consultee Family Name	Owens
Consultee Given Name	Jeremy
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM04
Q4page - Page	5 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD1 Overall Development Strategy
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Newcastle-under-Lyme Local Plan Main Modifications public consultation Proposed representation MM04</p> <p>Cheshire East Council notes the proposed insertion of Table 1a 'Employment Land Supply Information' at the end of paragraph 5.3. The Table identifies the provision of 148.94 hectares of employment land in the Plan, some 136% above the identified need for employment land (63 hectares) in the borough.</p> <p>There remains, therefore, a significant misalignment between the level of housing and economic growth in the Plan, including through the allocation of site AB2 involving the removal of land from the Green Belt. This site is located adjacent to the Cheshire East borough boundary and close to the Cheshire East towns of Crewe and Alsager. Newcastle-under-Lyme's Local Plan places a heavy and unjustified reliance on people living outside the Newcastle-under-Lyme borough to fill the level of jobs growth it is promoting. However, no evidence has been presented to understand the impact of this on Cheshire East, for example in terms of commuting patterns and housing demand. These important planning matters have not been sufficiently considered in allocating site AB2 and in determining whether exceptional circumstances exist to remove the site from the Green Belt.</p> <p>Cheshire East Council also notes the additional wording that is proposed to paragraph 5.3 describing strategic site AB2 '...as a high-quality logistics site with Heavy Goods Vehicle Lorry Parking...'. This description is at odds with Policy AB2 which allocates the site for a full range of employment uses, with no specific requirement for logistics development to form part of any future development mix.</p>

Comment ID	63
Response Date	15/12/2025 10:47:00
Consultee Company / Organisation	Betley, Balterley and Wrinehill Parish Council
Consultee Position	Parish Clerk and Responsible Financial Officer
Consultee Family Name	Parish Council
Consultee Given Name	Betley, Balterley and Wrinehill
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modification Schedule
Q4chap - Chapter, Appendix Number or Map Inset	13 Site Allocation
Q4polycypara - Policy / Paragraph	Policy AB2
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Dear Planning Policy,</p> <p>Please find below the comments of Betley, Balterley and Wrinehill Parish Council, to the consultation:-</p> <p>The Parish Council strongly supports major modifications MM06 and MM67;</p> <p>MM67 in respect of the Travel Plan that it "should discourage the routing of traffic past the Black Firs and Cranberry Bog SSSI on the A531".</p> <p>The Parish Council notes that the closing date for comments is the 17th December, and may decide to add to the comments submitted, before the deadline.</p> <p>Kind regards</p>
Comment ID	62
Response Date	15/12/2025 10:47:00
Consultee Company / Organisation	Betley, Balterley and Wrinehill Parish Council
Consultee Position	Parish Clerk and Responsible Financial Officer
Consultee Family Name	Parish Council
Consultee Given Name	Betley, Balterley and Wrinehill
Q4ref - MM Reference	MM06
Q4page - Page	7 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Paragraph 5.23
Q4polycypara - Policy / Paragraph	Supporting text to Policy PSD3 Distribution of Development
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Dear Planning Policy,</p> <p>Please find below the comments of Betley, Balterley and Wrinehill Parish Council, to the consultation:-</p> <p>The Parish Council strongly supports major modifications MM06 and MM67;</p> <p>MM06 in respect of no additional housing requirements being set out for each Designated Neighbourhood Area;</p> <p>The Parish Council notes that the closing date for comments is the 17th December, and may decide to add to the comments submitted, before the deadline.</p> <p>Kind regards</p>

Comment ID	39
Response Date	10/12/2025 12:10:00
Consultee Family Name	Phillips
Consultee Given Name	Mr R & Mrs J
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Re:- Representations on the Main Modifications to the Draft Local Plan. This representation relates only to the proposed modifications & not the matters previously considered at Regulation 19 stage. We particularly write to express our strong concerns regarding the continued inclusion of a AB2 (land at junction 16 of M6) within the Local Plan. The Planning Inspector has expressed serious concerns about the scale of the AB2 development & there appears to be serious outstanding & substantial issues which were previously identified during the examination: -</p> <p>We wish to highlight the following:-</p> <ul style="list-style-type: none"> • Traffic figures submitted by the developer are out of date &, therefore, any projections are likely to be severe under estimates. • Problems on the M6 & A500 directly impact upon the existing rural road network & create huge issues for the community including safety issues with HGV's on a single track road with limited lighting & no pavements on many roads. This concern also applies to the proposed 'emergency access' via Moat lane. There needs to be a clear definition of 'emergency use' & should be defined to the use by blue light emergency vehicles & exclude HGVs & staff transport. The data also does not take into account the daily congestion, queuing & frequent accidents on the A500, slip roads & at the M6 15 junction. Without complete & robust transport modelling, it is not possible to consider AB2 as sound or deliverable. • Concerns that the modifications introduce a requirement for micro- simulation transport modelling but does not appear to be required before the Local Plan is adopted- this is a major concern & unacceptable. • An inexplicable amount of large areas of green space (greenbelt) would be removed only to be re landscaped- why? The proposed modification does not support wildlife & recreational areas & undermines the principle of a landscape led master plan & should be reviewed/revised prior to adoption of Plan. • It may seem that as access is needed, it is likely to be a fly over, as with every junction on A500, ie on 2 levels, or a very large roundabout. This cost may impact the viability of the site &, therefore, should be considered & clarified before the Plan is adopted. • MM66, which removes policy SA1 weakens the policy framework surrounding AB2 & makes the attention of AB2 premature, unjustified& insufficiently evidenced in our view. <p>It's it is our view, in consideration of the above points of concern, that the planning inspector withhold the Final Report regarding AB2 until all highways modelling & up-to-date evidence is provided.</p>

Comment ID	155
Response Date	17/12/2025 22:44:39
Consultee Company / Organisation	Swifts Local Network: Swifts & Planning Group
Consultee Position	Chair
Consultee Family Name	Priaulx
Consultee Given Name	Mike
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM61
Q4page - Page	93-94
Q4policypara - Policy / Paragraph	Policy SE14 Green and Blue Infrastructure
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Modifications to Policy SE14 are not sound as not consistent with national policy: NPPG Natural Environment 2025 paragraph 017 on swift bricks.
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>To make the modifications to the policy sound and consistent with national policy, please add the wording of NPPG Natural Environment 2025 paragraph 017 regarding swift bricks.</p> <p><i>The National Planning Policy Framework expects development proposals to bolster wildlife by incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.</i></p> <p><i>The use of swift bricks is particularly important in this context because swifts rely on urban cavities for nesting, and the national loss of suitable nesting sites through building renovation has been part of the reason for the species' decline. Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.</i></p> <p><i>Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes.</i></p> <p><i>Paragraph: 017 Reference ID: 8-017-20250609</i></p>

Comment ID	43
Response Date	12/12/2025 11:04:00
Consultee Company / Organisation	National Highways
Consultee Position	Assistant Spatial Planner
Consultee Family Name	Pyner
Consultee Given Name	David
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Planning for Sustainable Development
Q4polycypara - Policy / Paragraph	PSD5 Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>National Highways welcomes the opportunity to comment on the Newcastle-under-Lyme Local Plan 2020–2040: Schedule of Proposed Main Modifications (October 2025) and Sustainability Appraisal of the Main Modifications (October 2025).</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. Our interest in this Local Plan relates to the operation of the M6 Junctions 15 and 16, the A500 and the A50 which forms the SRN in the area.</p> <p>In responding to Local Plan consultations, we have regard to DfT's Circular 01/2022 - SRN and the delivery of sustainable development ('the Circular'), which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>Main Modifications</p> <p>The Main Modifications do not materially alter the scale or broad distribution of development proposed in the Local Plan. However, several modifications have implications for the transport evidence base and the need for updated modelling to confirm that cumulative impacts on the SRN remain acceptable. National Highways would therefore expect clarification on how these changes have been reflected in the latest Transport Assessment work.</p> <p>MM08 – Policy PSD5 (Green Belt) and New Infrastructure Requirements</p> <p>MM08 introduces a number of amendments to Green Belt policy, including the removal of some previously proposed release sites and the addition of Madeley High School as a new allocation. The strengthened requirements for compensatory improvements and clearer expectations regarding permanent boundaries are noted. While these changes do not directly affect the SRN, any change in local peak time movement patterns, including those associated with school expansion, should be reflected in the updated modelling to ensure cumulative impacts are fully understood.</p> <p>Conclusion</p> <p>In summary, National Highways is broadly satisfied that the Main Modifications do not alter the overall development position of the Local Plan or introduce new the SRN. It remains important that the transport evidence is updated to reflect the amended development scenario, including all changes arising from the Main Modifications, so that cumulative impacts on the M6, A500 and A50 can be reliably understood. We will continue to work with the Council as the Infrastructure Delivery Plan and associated modelling are refined, to ensure that any requirements for mitigation are identified at the appropriate stage and that the Local Plan can be supported from a strategic transport perspective</p>
Comment ID	42
Response Date	12/12/2025 11:04:00
Consultee Company / Organisation	National Highways
Consultee Position	Assistant Spatial Planner
Consultee Family Name	Pyner
Consultee Given Name	David

Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM03-MM07
Q4page - Page	4-5
Q4chap - Chapter, Appendix Number or Map Inset	Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD1-PSD3
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>National Highways welcomes the opportunity to comment on the Newcastle-under-Lyme Local Plan 2020–2040: Schedule of Proposed Main Modifications (October 2025) and Sustainability Appraisal of the Main Modifications (October 2025).</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>Our interest in this Local Plan relates to the operation of the M6 Junctions 15 and 16, the A500 and the A50 which forms the SRN in the area.</p> <p>In responding to Local Plan consultations, we have regard to DfT's Circular 01/2022 - SRN and the delivery of sustainable development ('the Circular'), which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>Main Modifications</p> <p>The Main Modifications do not materially alter the scale or broad distribution of development proposed in the Local Plan. However, several modifications have implications for the transport evidence base and the need for updated modelling to confirm that cumulative impacts on the SRN remain acceptable. National Highways would therefore expect clarification on how these changes have been reflected in the latest Transport Assessment work.</p> <p>MM03–MM07: Development Strategy and Distribution</p> <p>These modifications update employment and housing supply figures, revise the distribution of development and provide greater clarity on the expected approach to infrastructure delivery. The reduction in the Newcastle town centre housing figure and the increase at Audley and Bignall End represent modest redistributions that may influence local routing and traffic flows. It will be important for the updated transport modelling to reflect these changes, particularly where development may affect movements towards M6 Junctions 15 and 16, the A500 and A50. The clarification on phasing and the role of Neighbourhood Plans is helpful, although the plan will still need to demonstrate through evidence that no further SRN mitigation arises from these adjustments.</p> <p>Conclusion</p> <p>In summary, National Highways is broadly satisfied that the Main Modifications do not alter the overall development position of the Local Plan or introduce new the SRN. It remains important that the transport evidence is updated to reflect the amended development scenario, including all changes arising from the Main Modifications, so that cumulative impacts on the M6, A500 and A50 can be reliably understood. We will continue to work with the Council as the Infrastructure Delivery Plan and associated modelling are refined, to ensure that any requirements for mitigation are identified at the appropriate stage and that the Local Plan can be supported from a strategic transport perspective</p>
Comment ID	46
Response Date	12/12/2025 11:04:00
Consultee Company / Organisation	National Highways
Consultee Position	Assistant Spatial Planner
Consultee Family Name	Pyner
Consultee Given Name	David
Q3Document - 3. Name of the Document to which this representation relates?	Main Modifications Sustainability Appraisal / Habitats Regulations Assessment
Q4ref - MM Reference	MM01 / MM17/MM29/MM110/MM115
Q4page - Page	Pg 2 of modifications schedule
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support	<p>National Highways welcomes the opportunity to comment on the Newcastle-under-Lyme Local Plan 2020–2040: Schedule of Proposed Main Modifications (October 2025) and Sustainability Appraisal of the Main Modifications (October 2025).</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority</p>

the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. Our interest in this Local Plan relates to the operation of the M6 Junctions 15 and 16, the A500 and the A50 which forms the SRN in the area.</p> <p>In responding to Local Plan consultations, we have regard to DfT's Circular 01/2022 - SRN and the delivery of sustainable development ('the Circular'), which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>Main Modifications</p> <p>The Main Modifications do not materially alter the scale or broad distribution of development proposed in the Local Plan. However, several modifications have implications for the transport evidence base and the need for updated modelling to confirm that cumulative impacts on the SRN remain acceptable. National Highways would therefore expect clarification on how these changes have been reflected in the latest Transport Assessment work.</p> <p>Sustainability Appraisal (SA)</p> <p>The Sustainability Appraisal reviews 121 Main Modifications and concludes that most do not result in new significant effects. MM01, which updates the Strategic Objectives, leads to positive sustainability outcomes through stronger commitments to pollution reduction, nature recovery and the protection of land resources. MM17, which relates to Gypsy and Traveller policy, results in negligible to minor effects and does not materially change sustainability performance. Modifications to the town centre policies (MM29, MM110 and MM115) indicate slight positive effects due to expected regeneration benefits and improved sustainable transport opportunities. The deletion of various site allocation policies is not assessed as giving rise to adverse environmental impacts, and overall the Sustainability Appraisal does not identify any substantial changes to the plan's residual impacts.</p> <p>While the Appraisal confirms that the modifications do not materially alter the transport baseline or the scale of cumulative traffic generation, its conclusions rely on earlier modelling work. It is therefore important that the PRTM model runs informing the Infrastructure Delivery Plan incorporate all updated allocations and deletions arising from the Main Modifications, and that the Sustainability Appraisal remains consistent with the most up to date transport evidence.</p> <p>Conclusion</p> <p>In summary, National Highways is broadly satisfied that the Main Modifications do not alter the overall development position of the Local Plan or introduce new the SRN. It remains important that the transport evidence is updated to reflect the amended development scenario, including all changes arising from the Main Modifications, so that cumulative impacts on the M6, A500 and A50 can be reliably understood. We will continue to work with the Council as the Infrastructure Delivery Plan and associated modelling are refined, to ensure that any requirements for mitigation are identified at the appropriate stage and that the Local Plan can be supported from a strategic transport perspective</p>
Comment ID	41
Response Date	12/12/2025 11:04:00
Consultee Company / Organisation	National Highways
Consultee Position	Assistant Spatial Planner
Consultee Family Name	Pyner
Consultee Given Name	David
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM01
Q4page - Page	2
Q4chap - Chapter, Appendix Number or Map Inset	4 Strategic Objectives
Q4policypara - Policy / Paragraph	4.8
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support	<p>National Highways welcomes the opportunity to comment on the Newcastle-under-Lyme Local Plan 2020–2040: Schedule of Proposed Main Modifications (October 2025) and Sustainability Appraisal of the Main Modifications (October 2025).</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. Our interest in this Local Plan relates to the operation of the M6 Junctions 15 and 16, the A500 and the A50 which forms the SRN in the area.</p>

the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>In responding to Local Plan consultations, we have regard to DfT's Circular 01/2022 - SRN and the delivery of sustainable development ('the Circular'), which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>Main Modifications</p> <p>The Main Modifications do not materially alter the scale or broad distribution of development proposed in the Local Plan. However, several modifications have implications for the transport evidence base and the need for updated modelling to confirm that cumulative impacts on the SRN remain acceptable. National Highways would therefore expect clarification on how these changes have been reflected in the latest Transport Assessment work.</p> <p>MM01 – Strategic Objectives</p> <p>The addition of SO14 to SO16 strengthens the Local Plan's strategic objectives relating to pollution reduction, nature recovery and soil protection, while retaining the objectives that support active travel, modal shift and improved transport accessibility. These changes reinforce the plan's direction towards sustainable travel and do not introduce new considerations for the SRN.</p> <p>Conclusion</p> <p>In summary, National Highways is broadly satisfied that the Main Modifications do not alter the overall development position of the Local Plan or introduce new the SRN. It remains important that the transport evidence is updated to reflect the amended development scenario, including all changes arising from the Main Modifications, so that cumulative impacts on the M6, A500 and A50 can be reliably understood. We will continue to work with the Council as the Infrastructure Delivery Plan and associated modelling are refined, to ensure that any requirements for mitigation are identified at the appropriate stage and that the Local Plan can be supported from a strategic transport perspective</p>
Comment ID	45
Response Date	12/12/2025 11:04:00
Consultee Company / Organisation	National Highways
Consultee Position	Assistant Spatial Planner
Consultee Family Name	Pyner
Consultee Given Name	David
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM17 and other deletions of site policies
Q4page - Page	16 of modifications schedule
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>National Highways welcomes the opportunity to comment on the Newcastle-under-Lyme Local Plan 2020–2040: Schedule of Proposed Main Modifications (October 2025) and Sustainability Appraisal of the Main Modifications (October 2025).</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>Our interest in this Local Plan relates to the operation of the M6 Junctions 15 and 16, the A500 and the A50 which forms the SRN in the area.</p> <p>In responding to Local Plan consultations, we have regard to DfT's Circular 01/2022 - SRN and the delivery of sustainable development ('the Circular'), which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>Main Modifications</p> <p>The Main Modifications do not materially alter the scale or broad distribution of development proposed in the Local Plan. However, several modifications have implications for the transport evidence base and the need for updated modelling to confirm that cumulative impacts on the SRN remain acceptable. National Highways would therefore expect clarification on how these changes have been reflected in the latest Transport Assessment work.</p> <p>MM17 and other deletions of site policies</p> <p>MM17 and the deletion of several site allocation policies, including AB12, AB33, CT1, CH13, KS3 and GT8, reduce development pressures in some areas. The Sustainability Appraisal identifies no significant</p>

	<p>effects arising from these deletions. It will nevertheless be necessary for these amendments to be incorporated into cumulative transport modelling to ensure that previous conclusions regarding impacts on the SRN remain valid.</p> <p>Conclusion</p> <p>In summary, National Highways is broadly satisfied that the Main Modifications do not alter the overall development position of the Local Plan or introduce new the SRN. It remains important that the transport evidence is updated to reflect the amended development scenario, including all changes arising from the Main Modifications, so that cumulative impacts on the M6, A500 and A50 can be reliably understood. We will continue to work with the Council as the Infrastructure Delivery Plan and associated modelling are refined, to ensure that any requirements for mitigation are identified at the appropriate stage and that the Local Plan can be supported from a strategic transport perspective</p>
Comment ID	44
Response Date	12/12/2025 11:04:00
Consultee Company / Organisation	National Highways
Consultee Position	Assistant Spatial Planner
Consultee Family Name	Pyner
Consultee Given Name	David
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM09-MM12
Q4page - Page	9 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Planning for Sustainable Development / Climate Change
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>National Highways welcomes the opportunity to comment on the Newcastle-under-Lyme Local Plan 2020–2040: Schedule of Proposed Main Modifications (October 2025) and Sustainability Appraisal of the Main Modifications (October 2025).</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>Our interest in this Local Plan relates to the operation of the M6 Junctions 15 and 16, the A500 and the A50 which forms the SRN in the area.</p> <p>In responding to Local Plan consultations, we have regard to DfT's Circular 01/2022 - SRN and the delivery of sustainable development ('the Circular'), which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>Main Modifications</p> <p>The Main Modifications do not materially alter the scale or broad distribution of development proposed in the Local Plan. However, several modifications have implications for the transport evidence base and the need for updated modelling to confirm that cumulative impacts on the SRN remain acceptable. National Highways would therefore expect clarification on how these changes have been reflected in the latest Transport Assessment work.</p> <p>MM09–MM12 – Health, Design, Climate & Renewable Energy Policies</p> <p>These modifications update policies relating to health, design, climate change and renewable energy. The reference to LTN 1/20, the stronger emphasis on minimising trip generation and the support for active travel all reinforce alignment with national policy aims to reduce reliance on private car use. These changes support wider demand reduction objectives and do not introduce new issues for the SRN.</p> <p>Conclusion</p> <p>In summary, National Highways is broadly satisfied that the Main Modifications do not alter the overall development position of the Local Plan or introduce new the SRN. It remains important that the transport evidence is updated to reflect the amended development scenario, including all changes arising from the Main Modifications, so that cumulative impacts on the M6, A500 and A50 can be reliably understood. We will continue to work with the Council as the Infrastructure Delivery Plan and associated modelling are refined, to ensure that any requirements for mitigation are identified at the appropriate stage and that the Local Plan can be supported from a strategic transport perspective</p>

Comment ID	83
Response Date	12/12/2025 10:45:00
Consultee Family Name	Reynolds
Consultee Given Name	Jacqueline
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM66
Q4page - Page	45 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy SA1 General Requirements
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	Removing Policy SA1 (MM66) weakens the surrounding framework of AB2 and therefore proposed modifications in the Draft Local Plan, premature, unjustified and insufficiently evidenced.
Comment ID	82
Response Date	12/12/2025 10:45:00
Consultee Family Name	Reynolds
Consultee Given Name	Jacqueline
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at J16 of the M6'
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I am writing this letter regarding modifications to the draft Local Plan.</p> <p>My concerns are it is to the proposed modifications and not looking at the matters highlighted at the Regulation 19 Stage.</p> <p>The Local Planning Inspector has noted and expressed serious concerns about the overall size of the proposed AB2 development. They were identified but there is no mention about going forward to address the matters. Surely we need clarity on why this has not been noted before we go forward regarding the proposed modifications if at all.</p> <p>There is strong concerns locally regarding the M6 & A500, and how it will impact upon the existing rural road network.</p> <p>A major issue will be safety regarding HGV's on a single-track road which has no pavements, lighting on majority of said road. To propose an "emergency access" via Moat Lane and including Barthomley Road is in my opinion bordering on irrational and reckless long term.</p> <p>"Emergency Access" has not been defined throughout the process. Emergency service vehicles we would assume but could easily be breached to include HGV's etc.</p> <p>Traffic figures submitted by the developer regarding AB2 are out of date. Those figures need to be reviewed and updated, as they are projections which will be underestimated due to recent traffic incidents and recent reports.</p> <p>The A500 slip road leading to Audley/Alsager has had an upsurge of traffic incidents over the last year with a rise most recently. Is it noted as being a known hotspot by the Audley Parish Council.</p> <p>It has been suggested that motorists are using the slip road to skip the queuing traffic on the A500 which has grown considerably over the last few years and will increase involving the Police attending accidents and Ambulance Services due to personal injury.</p> <p>The data from the developer does not note the daily congestion, queuing and frequent accidents on the A500 slip road and the M6 Junction 15.</p>

All these above concerns need to be addressed completely before AB2 can be seriously considered.

The size of land to be obtained by the developers is questionable. The amount of Green Belt removed by this plan would be catastrophic to the landscape, wildlife especially the eco-structure.

In the plan there is mention of landscape by the developers. Why if that is so would they remove Green Belt to then replace it with some form of landscaping. Proposals are alright but can be changed later on with to repercussions once done.

It has been mentioned ways of allowing access to this extremely large site if allowed to proceed. Roundabout and flyover besides others. Whichever is chosen would impact the costs regarding the viability of said site.

Access has to be determined and clarified before the Plan (AB2) can be seriously adopted.

Regarding all of the above I ask the Planning Inspector to view my concerns regarding AB2 and withhold a Final Report until all evidence and updated data from Highways modelling be submitted.

I stress the importance of all evidence being current and all avenues explored to produce measures and actions to arrive at a right decision for our community, when changing land to enhance biological diversity and abundance not pollution, climate change and pressure of Infrastructure and irreversible loss of resources which Green Belt provides.

Comment ID	68
Response Date	15/12/2025 10:50:00
Consultee Family Name	Richborough Estates
Agent Company / Organisation	Knights
Agent Family Name	Corinaldi-Knott
Agent Given Name	Alan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	Policy PSD5 Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This submission is made on behalf of Richborough in response to the proposed Main Modifications to the Local Plan, in particular modification references MM08 and MM106. These modifications relate to Green Belt compensatory improvements and the proposed modifications to Site Allocation Policy TB19. In addition, brief comments are provided on the proposed modifications to the policies map.</p> <p>These are each considered in turn below:</p> <p><u>MM08:</u></p> <p>Criteria 6 and 7 amends policy relating to providing compensatory improvements to the Green Belt. The introduction of wording stating that the details of such improvements will be considered during the development management process and assessed during individual applications is supported as this provides flexibility and avoids placing potential unnecessary or undeliverable burdens on landowners and developers.</p> <p><u>Conclusion</u></p> <p>It is considered that the proposed modifications to the plan, subject to taking into account the comments above, would ensure that the plan as a whole meets the tests of soundness set out in the National Planning Policy Framework, and that subject to modifications, that the Local Plan as modified, can be found sound, such that the Inspector can recommend to the Council that the plan can be adopted in due course.</p> <p>Should you wish to discuss this submission further, then please do not hesitate to contact us.</p> <p>Should the Inspector determine that further hearing sessions are necessary, then we would like to place on record our intention to attend such hearing sessions if deemed necessary by the Inspector.</p>
Comment ID	72
Response Date	15/12/2025 10:50:00
Consultee Family Name	Richborough Estates
Agent Company / Organisation	Knights
Agent Family Name	Corinaldi-Knott
Agent Given Name	Alan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Modifications to the Submitted Local Plan Policies Maps
Q4ref - MM Reference	Policies Map (PM03)
Q4page - Page	PM03 of Schedule of Modifications to Policies Map
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This submission is made on behalf of Richborough in response to the proposed Main Modifications to the Local Plan, in particular modification references MM08 and MM106. These modifications relate to Green Belt compensatory improvements and the proposed modifications to Site Allocation Policy TB19. In addition, brief comments are provided on the proposed modifications to the policies map.</p> <p>These are each considered in turn below:</p> <p><u>Policies Map</u></p> <p>The proposed changes to the policies map showing the indicative route of the proposed link road and the demarcation of the development boundary within the site is supported. In order to make the proposals map more clear, it is suggested that the land to be identified as country park within the TB19 allocation is shown in a different colour.</p> <p>In addition to the above, the key should be amended regarding the link road. The wording of "safeguarded route" and "safeguarded route (constructed by TB19)" should be worded "indicative safeguarded route" and "indicative safeguarded route (constructed by TB19)" to be consistent with the wording of criteria 11 of Policy TB19 as set out in the proposed Main Modifications.</p>

	<p><u>Conclusion</u></p> <p>It is considered that the proposed modifications to the plan, subject to taking into account the comments above, would ensure that the plan as a whole meets the tests of soundness set out in the National Planning Policy Framework, and that subject to modifications, that the Local Plan as modified, can be found sound, such that the Inspector can recommend to the Council that the plan can be adopted in due course.</p> <p>Should you wish to discuss this submission further, then please do not hesitate to contact us.</p> <p>Should the Inspector determine that further hearing sessions are necessary, then we would like to place on record our intention to attend such hearing sessions if deemed necessary by the Inspector.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The key should be amended regarding the link road. The wording of “safeguarded route” and “safeguarded route (constructed by TB19)” should be worded “indicative safeguarded route” and “indicative safeguarded route (constructed by TB19)” to be consistent with the wording of criteria 11 of Policy TB19.</p>
Comment ID	69
Response Date	15/12/2025 10:50:00
Consultee Family Name	Richborough Estates
Agent Company / Organisation	Knights
Agent Family Name	Corinaldi-Knott
Agent Given Name	Alan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM106
Q4page - Page	68 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy TB19
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>This submission is made on behalf of Richborough in response to the proposed Main Modifications to the Local Plan, in particular modification references MM08 and MM106. These modifications relate to Green Belt compensatory improvements and the proposed modifications to Site Allocation Policy TB19. In addition, brief comments are provided on the proposed modifications to the policies map.</p> <p>These are each considered in turn below:</p> <p><u>MM106</u></p> <p>Criteria 6 is proposed to be amended to secure a site specific flood risk assessment, drainage strategy and SUDs management and maintenance plan. No objections are made to this aspect of the policy.</p> <p>Criteria 9 is proposed to be amended to secure strategic open space in the form of a country park to be retained in the wider green belt, along with the provision of a permanent and durable boundary. The criteria seeks to create a durable boundary through planting of native species.</p> <p>The delineation of the boundary is proposed to follow the line of the existing electricity pylons. The planting of native species can be delivered along this boundary, however the ongoing and future maintenance of the pylons by the statutory undertaker needs to be taken into account, and this should be reflected in the wording of the policy with the addition of the words “<i>Any planting should take into account the existing electricity pylons and ensure that any easements are maintained and access for maintenance is available at all times</i>”.</p> <p>The amendment to criteria 11 relating to the safeguarding of the future transport link is supported, and this wording has been agreed between Richborough, the Borough Council, and Staffordshire County Council as the Highway Authority.</p> <p>It was also agreed between the parties that the extent of the safeguarded route would be delivered in the future by the Highway Authority and funded through planning obligations from the SP11 and SP23 sites. This should be referenced in the supporting text to the policy.</p> <p>The existing policy TB19 criteria 10 makes reference to a need to undertake a geoenvironmental survey in relation to fracking. This point was discussed at the examination hearings and it was suggested that this policy criteria be deleted from the plan as there is no evidence of fracking taking place in the area. The County Council have never granted planning permission for such and there are no records on their planning applications database. As such, it is again recommended that this policy criteria should be deleted.</p>

	<p><u>Conclusion</u></p> <p>It is considered that the proposed modifications to the plan, subject to taking into account the comments above, would ensure that the plan as a whole meets the tests of soundness set out in the National Planning Policy Framework, and that subject to modifications, that the Local Plan as modified, can be found sound, such that the Inspector can recommend to the Council that the plan can be adopted in due course.</p> <p>Should you wish to discuss this submission further, then please do not hesitate to contact us.</p> <p>Should the Inspector determine that further hearing sessions are necessary, then we would like to place on record our intention to attend such hearing sessions if deemed necessary by the Inspector.</p>
<p>Q7 Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Criteria 9 - addition of the words "<i>Any planting should take into account the existing electricity pylons and ensure that any easements are maintained and access for maintenance is available at all times</i>"</p> <p>Criteria 10 - deletion in its entirety 10. Submission of geo-environmental survey in relation to applications for fracking in the area</p>

Comment ID	175
Response Date	16/12/2025 10:37:00
Consultee Company / Organisation	Protect Audley Parish Green Belt Group
Consultee Family Name	Roberts
Consultee Given Name	Gary
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy CT1 Land at Red Street and High Carr Farm
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Newcastle Under Lyme Local Plan – Main modifications Consultation MM69, MM71 and MM73</p> <p>We welcome the following modifications which PAPG supports: the removal of AB12 Diglake Street, AB33 Nantwich Road and CT1 Red Street. All of which are unsound due to major infrastructure weaknesses (namely poor vehicular access, flooding and mining works, respectively) that cast doubt on their viability.</p>
Comment ID	112
Response Date	16/12/2025 10:37:00
Consultee Company / Organisation	Protect Audley Parish Green Belt Group
Consultee Family Name	Roberts
Consultee Given Name	Gary
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 Land at J16 of the M6
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Newcastle Under Lyme Local Plan – Main modifications Consultation MM67</p> <p>Whilst we welcome and support the need for a micro-simulation model of the impact on our highways (AB2 para7) we feel that this should be undertaken BEFORE the Local Plan is adopted OR the site should be removed from the Plan (these actions are suggested in order to dispel strong doubts about the viability of the site and ensure that the Plan is sound).</p> <p>The promoter of the site has stated that the plans for AB2, including details of access, have been in development since at least 2018. Yet, the access included in the recent planning application was found to be substandard and was rejected by National Highways. There is a very real possibility that a suitable access will cost far more than the promoter envisages and provided for.</p> <p>It should be noted that no other employment site has direct access to the A500 and every junction on the A500 in Staffordshire between the M6 junctions is grade-separated, i.e. on two levels, other than the first ... which is a very large at-grade roundabout. No case has been made for the AB2 access to be any different (any suboptimal access will very likely result in tax payers having to fund future remedial works).</p> <p>There are many indications that the Local Plan was rushed (holding a full Council vote to submit the draft Local Plan before all evidence documents had been published, failure to supply additional information regarding the HRA prior to submission, etc.). PAPG considers that the inclusion of AB2 is premature and that there is a lack of information, particularly regarding access and transport, to show that it is deliverable.</p> <p>The Local Plan can withstand removal of the AB2 site as the remaining allocated employment sites (68.94 ha) is comfortably above the minimum 63 ha need. There are other potential sites, the Borough Council has already indicated a timetable for reviewing the Local Plan and any additional employment</p>

	<p>sites can be included within that update (local employment site closures and low demand suggests that such sites are more likely to be needed, if at all, later in the Plan timespan anyway).</p> <p>Our objections notwithstanding, any mitigation measures need to take the following into account:</p> <p>The need to recognise the scale of the current problems and that the traffic figures submitted by the promoters are way out of date (as shown by counts undertaken by volunteers and by the TRIS figures) and, therefore, any projections are severe under-estimates.</p> <p>The need to define what emergency use of Moat Lane is: It should be limited to emergency vehicles and not HGVs and employee's cars when the A500 access is inoperative.</p> <p>The country lanes around the site are not designed and constructed to take HGVs. When the A500 was blocked recently, HGVs diverted through local country lanes and two got stuck in the drainage ditches.</p> <p>AB2 para 13: There is a need to state how vehicles will be discouraged from driving past Black Firs and Craddock's Moss SSSIs. Without such details, how can one be confident that any measures will work? This should be shown BEFORE the Local Plan is adopted to ensure that the measures will genuinely protect these invaluable sites.</p> <p>We support the requirement for a landscape and visual impact assessment (AB2 para 9). Regarding AB2 para 15: PAPG objects to the removal of the large green space between footpaths Audley 9 and 22 and substitution with green corridors: these corridors will not enhance public rights of way (being hemmed in by giant warehouses) and will ensure the loss of farmland birds on this site (they need open fields, not hedge lined footpaths).</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Removal of site AB2 from the Local Plan
Comment ID	173
Response Date	16/12/2025 10:37:00
Consultee Company / Organisation	Protect Audley Parish Green Belt Group
Consultee Family Name	Roberts
Consultee Given Name	Gary
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB12 Land East of Diglake Street
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Newcastle Under Lyme Local Plan – Main modifications Consultation MM69, MM71 and MM73</p> <p>We welcome the following modifications which PAPG supports: the removal of AB12 Diglake Street, AB33 Nantwich Road and CT1 Red Street. All of which are unsound due to major infrastructure weaknesses (namely poor vehicular access, flooding and mining works, respectively) that cast doubt on their viability.</p>
Comment ID	174
Response Date	16/12/2025 10:37:00
Consultee Company / Organisation	Protect Audley Parish Green Belt Group
Consultee Family Name	Roberts
Consultee Given Name	Gary

Q3 Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB33 Land off Nantwich Road
Q5Sound - Sound	No
Q6 Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p><u>Newcastle Under Lyme Local Plan – Main modifications Consultation MM69, MM71 and MM73</u></p> <p>We welcome the following modifications which PAPG supports: the removal of AB12 Diglake Street, AB33 Nantwich Road and CT1 Red Street. All of which are unsound due to major infrastructure weaknesses (namely poor vehicular access, flooding and mining works, respectively) that cast doubt on their viability.</p>

Comment ID	26
Response Date	04/12/2025 10:49:00
Consultee Family Name	Rowley
Consultee Given Name	Ian
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	Policy PSD5: Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The AB2 site is currently designated as Green Belt. National planning policy (NPPF) strictly requires that Green Belt boundaries should only be altered in "exceptional circumstances". Core Objections: - Lack of Justification: The documentation fails to robustly demonstrate the exceptional circumstances necessary to justify the removal of 80 hectares of Green Belt land. - Scale Exceeds Need: The proposed 80-hectare site (approximately 220,000 sq. m GIA of storage and distribution) is argued to be substantially more than the Borough's objectively assessed employment land needs, as noted by the Planning Inspector during the Local Plan Examination. Allocating land that far exceeds local requirements undermines the exceptional circumstances test. - Purpose of Green Belt: The site currently fulfils key Green Belt purposes by: o Preventing the unrestricted sprawl of large built-up areas (specifically the coalescence of Audley/Bignall End with adjacent settlements). o Preserving the setting and special character of Audley Rural Parish. o Maintaining the open countryside and the agricultural function of the land. - Alternative Sites: The proposed plan should explore either the economic/employment need does not necessitate the use of Green Belt land, or that sequentially preferable, non-Green Belt sites have not been fully explored or appropriately weighted.</p>
Comment ID	28
Response Date	04/12/2025 11:06:00
Consultee Family Name	Rowley
Consultee Given Name	Ian
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at Junction 16 of the M6'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The proposed development of six "Big Box" logistics warehouses and a 200-space HGV lorry park will generate a massive increase in vehicle movements, particularly Heavy Goods Vehicles (HGVs). Core Objections: - Road Safety and Congestion: The proposed access arrangements, including modifications near the A500 and M6 Junction 16 slip roads, are inadequate to handle the projected traffic volume safely. o Existing issues with congestion and traffic collisions at the A500 slip road exits (Audley/Alsager Road) are already a documented concern. Adding thousands of daily vehicle movements, especially HGVs, will exacerbate these existing safety hazards. - Impact on Local Roads: There is significant concern that HGV traffic will utilize local residential roads (such as Park Lane, Moat Lane, and potentially others) as cut-through routes to avoid congestion, severely impacting the amenity and safety of residents in Audley, Bignall End, and surrounding villages. - Infrastructure Costs: Clarity is needed on who will fund the necessary major improvements to the local road network and Junction 16 interfaces, which will be required to mitigate the development's impact.</p> <p>The site's massive scale and 24/7 logistics operation will cause significant and irreversible harm to the local environment and the quality of life for residents. Core Objections: - Light Pollution: The operation of large warehouses, service yards, and the lorry park, potentially 24 hours a day, will generate substantial light spill, severely impacting the dark skies and the rural character of the area. - Noise Pollution: Increased noise from HGV movements, refrigeration units, forklift operations, and general site activity, particularly during night-time hours, will cause unacceptable harm to the residential amenity of nearby properties. - Air Quality: The concentration of HGV traffic will lead to a localised deterioration of air quality, affecting the health of residents. - Loss of Countryside/Visual Impact: The development will result in the permanent loss of a large area of open, agricultural countryside, replacing it with massive industrial structures that will dramatically alter the visual landscape and rural setting of the Parish.</p> <p>The proposed allocation of AB2 directly conflicts with the vision and policies of the locally ratified Audley Rural Neighbourhood Plan (ARNP), which now forms part of the statutory Development Plan. Core Objections: - Incompatible Development: The ARNP seeks to preserve the rural character of the parish</p>

and protect key green spaces. The AB2 logistics hub is an urbanising form of development that is fundamentally incompatible with the Neighbourhood Plan's aims. - Lack of Local Benefit: While the site is designated for employment, its strategic scale and location suggest most jobs and economic benefits will serve the wider region (Cheshire East, Stoke-on-Trent) rather than meeting specific, localized employment needs within Audley Rural Parish.

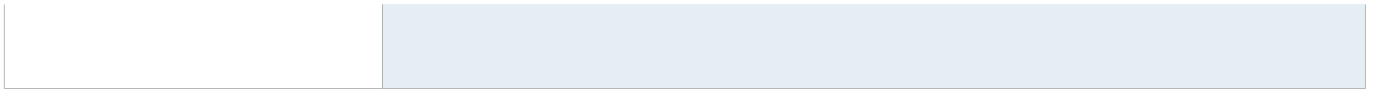
Major procedural objections have been lodged by the neighbouring authority, Cheshire East Council, challenging the plan's compliance with the Duty to Cooperate. Core Objections: - Extraneous Impacts: Cheshire East Council formally objected, noting that the site is geographically closer to settlements within their borough (such as Crewe and Alsager) than to the core of Newcastle-under-Lyme. - Unmet Needs/Travel Patterns: The objection raises concerns that the employment opportunities created at AB2 will generate demand for housing and supporting infrastructure within Cheshire East, placing an unexpected and potentially unsustainable burden on their own local plan and services. - Travel Patterns: Concerns that the site will alter regional travel patterns, increasing commuter and HGV traffic flows through Cheshire East's roads and impacting their air quality targets.

Comment ID	27
Response Date	04/12/2025 11:02:00
Consultee Family Name	Rowley
Consultee Given Name	Jill
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	Policy PSD5: Green Belt
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The AB2 site is currently designated as Green Belt. National planning policy (NPPF) strictly requires that Green Belt boundaries should only be altered in "exceptional circumstances". Core Objections: - Lack of Justification: The documentation fails to robustly demonstrate the exceptional circumstances necessary to justify the removal of 80 hectares of Green Belt land. - Scale Exceeds Need: The proposed 80-hectare site (approximately 220,000 sq. m GIA of storage and distribution) is argued to be substantially more than the Borough's objectively assessed employment land needs, as noted by the Planning Inspector during the Local Plan Examination. Allocating land that far exceeds local requirements undermines the exceptional circumstances test. - Purpose of Green Belt: The site currently fulfils key Green Belt purposes by: o Preventing the unrestricted sprawl of large built-up areas (specifically the coalescence of Audley/Bignall End with adjacent settlements). o Preserving the setting and special character of Audley Rural Parish. o Maintaining the open countryside and the agricultural function of the land. - Alternative Sites: The proposed plan should explore either the economic/employment need does not necessitate the use of Green Belt land, or that sequentially preferable, non-Green Belt sites have not been fully explored or appropriately weighted.</p>
Comment ID	29
Response Date	04/12/2025 11:08:00
Consultee Family Name	Rowley
Consultee Given Name	Jill
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Policy AB2 'Land at Junction 16 of the M6'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The proposed development of six "Big Box" logistics warehouses and a 200-space HGV lorry park will generate a massive increase in vehicle movements, particularly Heavy Goods Vehicles (HGVs). Core Objections: - Road Safety and Congestion: The proposed access arrangements, including modifications near the A500 and M6 Junction 16 slip roads, are inadequate to handle the projected traffic volume safely. o Existing issues with congestion and traffic collisions at the A500 slip road exits (Audley/Alsager Road) are already a documented concern. Adding thousands of daily vehicle movements, especially HGVs, will exacerbate these existing safety hazards. - Impact on Local Roads: There is significant concern that HGV traffic will utilize local residential roads (such as Park Lane, Moat Lane, and potentially others) as cut-through routes to avoid congestion, severely impacting the amenity and safety of residents in Audley, Bignall End, and surrounding villages. - Infrastructure Costs: Clarity is needed on who will fund the necessary major improvements to the local road network and Junction 16 interfaces, which will be required to mitigate the development's impact.</p> <p>The site's massive scale and 24/7 logistics operation will cause significant and irreversible harm to the local environment and the quality of life for residents. Core Objections: - Light Pollution: The operation of large warehouses, service yards, and the lorry park, potentially 24 hours a day, will generate substantial light spill, severely impacting the dark skies and the rural character of the area. - Noise Pollution: Increased noise from HGV movements, refrigeration units, forklift operations, and general site activity, particularly during night-time hours, will cause unacceptable harm to the residential amenity of nearby properties. - Air Quality: The concentration of HGV traffic will lead to a localised deterioration of air quality, affecting the health of residents. - Loss of Countryside/Visual Impact: The development will result in the permanent loss of a large area of open, agricultural countryside, replacing it with massive industrial structures that will dramatically alter the visual landscape and rural setting of the Parish.</p> <p>The proposed allocation of AB2 directly conflicts with the vision and policies of the locally ratified Audley Rural Neighbourhood Plan (ARNP), which now forms part of the statutory Development Plan. Core Objections: - Incompatible Development: The ARNP seeks to preserve the rural character of the parish</p>

and protect key green spaces. The AB2 logistics hub is an urbanising form of development that is fundamentally incompatible with the Neighbourhood Plan's aims. - Lack of Local Benefit: While the site is designated for employment, its strategic scale and location suggest most jobs and economic benefits will serve the wider region (Cheshire East, Stoke-on-Trent) rather than meeting specific, localized employment needs within Audley Rural Parish.

Major procedural objections have been lodged by the neighbouring authority, Cheshire East Council, challenging the plan's compliance with the Duty to Cooperate. Core Objections: - Extraneous Impacts: Cheshire East Council formally objected, noting that the site is geographically closer to settlements within their borough (such as Crewe and Alsager) than to the core of Newcastle-under-Lyme. - Unmet Needs/Travel Patterns: The objection raises concerns that the employment opportunities created at AB2 will generate demand for housing and supporting infrastructure within Cheshire East, placing an unexpected and potentially unsustainable burden on their own local plan and services. - Travel Patterns: Concerns that the site will alter regional travel patterns, increasing commuter and HGV traffic flows through Cheshire East's roads and impacting their air quality targets.

Comment ID	172
Response Date	17/12/2025 10:40:00
Consultee Family Name	Smith
Consultee Given Name	Ben
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 (land at J16 of M6)
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>To whom it may concern,</p> <p>I am pleased to hear the removal of AB12 Dislike Street (125 houses), AB33 Nantwich Road (55 houses) and CT1 Red Street (530 houses). All of which would have been pressure on our local highways and other infrastructure.</p> <p>AB2 - I am disappointed to see AB2 remains on the Plan even though the Planning Inspector expressed serious concerns about the scale of the development.</p> <p>Whilst the Planning Inspector expressed serious concerns about the scale of the AB2 development at the junction of the A500 and M6, she has given the benefit of the doubt to the Borough Council and, unfortunately, AB2 is still in the Plan. I am disappointed to see AB2 remains on the Plan even though the Planning Inspector expressed serious concerns about the scale of the development. As a resident on (redacted by admin), we feel AB2 would have serious impact on our everyday living and have grave concerns about the safety of the street with the increase in traffic and through road to site. he need to recognise the scale of the current problems and that the traffic figures submitted by the developers are way out of date and, therefore, any projections are severely under-estimated.</p> <p>We welcome and support the need for a micro-simulation model of the impact on our highways (AB2 para7) but feel that, as the access needed is likely to be a flyover (every junction on the A500 in Staffordshire is grade-separated, i.e. on two levels, other than the first ... which is a very large roundabout) the cost of this may impact the viability of the site and, therefore, this should be undertaken BEFORE the Local Plan is adopted.</p> <p>Any mitigation measures need to take the following into account:</p> <p>The need to recognise the scale of the current problems and that the traffic figures submitted by the developers are way out of date and, therefore, any projections are severe under-estimates. Let them know of the problems you experience.</p> <p>The need to define what emergency use of Moat Lane is: It should be limited to emergency vehicles and not HGVs and employee's cars when the A500 access is inoperative. The need to define what emergency use of Moat Lane is - it shouldn't be used for employee's cars or HGVs as an alternative to the A500. This should be emergency vehicles only. Living on (redacted by admin), only 3 houses from Moat Lane causes great concern us, the roads are narrow and already used as a cut through with drivers not taking due care and driving in excess of the speed limit it would without question be an area that is unsuitable for walking on if the proposals go ahead, with ourselves feeling like we would be in danger simply leaving the driveway. I can't imagine the use of this road will be monitored therefore by allowing the development to go through will also guarantee that this will increase the traffic along local roads. We have invested heavily into our property and purchased the house in 2022 with key elements of the purchase being the rural setting, quietness and safety the location brings, all of which we fear with proposed modifications and outlines in the plan that will greatly affect us, not to mention the potential severe decrease in desirability of the area and directly our house value being within such proximity of the current proposal of AB2.</p> <p>AB2 para 13: The need to state how they will discourage routing of traffic past Black Firs and Craddock's Moss SSSIs. This should be shown BEFORE the Local Plan is adopted to ensure that the measures will genuinely protect these invaluable sites.</p> <p>We support the requirement for a landscape and visual impact assessment (AB2 para 9). Regarding AB2 para 15: PAPG objects to the removal of the large green space between footpaths Audley 9 and 22 and substitution with green corridors: these corridors will not enhance public rights of way (being hemmed in by giant warehouses) and will ensure the loss of farmland birds on this site (they need open fields, not hedge lined footpaths).</p> <p>Given the considerable unresolved matters associated with AB2, I respectfully request that the Planning Inspector withhold her final report and resist progressing any further. As a resident of (redacted by admin) we first hand see the diverse wildlife and ecosystems such as birds of prey, wild birds, bees and insects and other wild animals that flourish in the rural grounds that will be occupied by AB2 if this was to go ahead.</p> <p>We would also like to see a report on the noise pollution and impact this will have on our location with us being so close to AB2 as we fear this could affect our health and wellbeing.</p>



Comment ID	14
Response Date	04/12/2025 12:55:00
Consultee Company / Organisation	Canal and Rivers Trust
Consultee Family Name	Smith
Consultee Given Name	Hazel
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM46
Q4page - Page	32 of Main Modification Schedule
Q4policypara - Policy / Paragraph	SE4 Sustainable Drainage System
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Thank you for your consultation on the above document.</p> <p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework. We consider the proposed Main Modifications appear to be sound and legally compliant.</p> <p>We note that minor modifications to the wording to provide greater clarification of the Trust's role within the delivery of the plans aims have been included within the Main Modifications following our comments on the Draft Local Plan Consultation in 2024. However, this has not fully occurred in MM46, so we recommend that the correct nomenclature within criteria 4 should be Canal & River Trust (both canal and river being singular). We hope that this can be included within the final version as a minor typographical correction.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>We note that minor modifications to the wording to provide greater clarification of the Trust's role within the delivery of the plans aims have been included within the Main Modifications following our comments on the Draft Local Plan Consultation in 2024. However, this has not fully occurred in MM46, so we recommend that the correct nomenclature within criteria 4 should be Canal & River Trust (both canal and river being singular). We hope that this can be included within the final version as a minor typographical correction.</p>

Comment ID	123
Response Date	16/12/2025 15:12:00
Consultee Company / Organisation	The Strategic Land Group
Consultee Position	Managing Director
Consultee Family Name	Smith
Consultee Given Name	Paul
Agent Company / Organisation	Emery Planning
Agent Position	Director
Agent Family Name	Coxon
Agent Given Name	John
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM104
Q4page - Page	68 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	TK27
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The deletion of criterion 1 of Policy TK27 is necessary following the deletion of Policy SA1.</p> <p>SLG sought amendments to part 8 of the policy, relating to highways works at the Coppice Road / Merelake Road / Coal Pit Lane Junction. We can confirm that the proposed revision to part 8 addresses the issues of soundness that we identified, and we support the revision to this part of the policy.</p> <p>SLG previously sought amendments to criteria 9 and 10 (see our Matter 7 hearing statement). As these criteria have not been amended, we assume that the Inspector has concluded that the amendments were not necessary in order to make the plan sound. Nevertheless, for clarity, our objections to the detailed wording of those criteria remain.</p>
Comment ID	122
Response Date	16/12/2025 15:12:00
Consultee Company / Organisation	The Strategic Land Group
Consultee Position	Managing Director
Consultee Family Name	Smith
Consultee Given Name	Paul
Agent Company / Organisation	Emery Planning
Agent Position	Director
Agent Family Name	Coxon
Agent Given Name	John
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM66
Q4page - Page	45 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	SA1
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant	Policy SA1 and its role for the allocated sites was discussed extensively during the hearings. Whilst our original representations only sought minor detailed amendments to the policy, in light of the discussions and other amendments within the plan, we support its deletion.

or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	
Comment ID	110
Response Date	16/12/2025 15:12:00
Consultee Company / Organisation	The Strategic Land Group
Consultee Position	Managing Director
Consultee Family Name	Smith
Consultee Given Name	Paul
Agent Company / Organisation	Emery Planning
Agent Position	Director
Agent Family Name	Coxon
Agent Given Name	John
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM08
Q4page - Page	8 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD5 Green Belt
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	Yes
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	The policy has been amended to provide further clarification on the approach to Green Belt Compensatory Improvements. SLG supports the proposed amendments, namely the additions at Section 6 and 7 of the policy, and the additional supporting text at paragraph 5.33. We consider that the proposed policy as amended is consistent with national policy, and the requirements are proportionate and achievable. SLG has previously provided details of potential options for compensatory improvements in respect of site allocation TK27.
Comment ID	125
Response Date	16/12/2025 15:12:00
Consultee Company / Organisation	The Strategic Land Group
Consultee Position	Managing Director
Consultee Family Name	Smith
Consultee Given Name	Paul
Agent Company / Organisation	Emery Planning
Agent Position	Director
Agent Family Name	Coxon
Agent Given Name	John
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM121
Q4page - Page	75 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Appendix 8
Q4policypara - Policy / Paragraph	Appendix 8
Q5LegallyCompliant - Legally compliant	Yes

Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We support the addition of Appendix 8, which provides useful guidance for planning applications in relation to site allocations.</p> <p>However, the Inspector will recall that SLG raised concerns through its representations to Policy SA1 (now deleted) as to whether masterplans are needed on all sites. This is particularly important for smaller sites without significant onsite infrastructure requirements (for example our client's site TK27, which is allocated for 90 dwellings). In such cases requiring a masterplan may unnecessarily delay delivery.</p> <p>Therefore, whilst we very much support the clarification in the policy that the need for a masterplan requirements particularly relates to applications made in outline, we consider that an additional sentence should be added to clarify that a planning application is a potential route for the approval of a masterplan. We therefore propose the following additional sentence:</p> <p>"Whilst each proposal will be considered on its own merits, an appropriate mechanism for approving a masterplan can be through the planning application process."</p> <p>This would represent a minor change to an appendix to the plan, and reflects the substance of the discussions at the hearings. It could therefore be added without the need for further consultation.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>We consider that an additional sentence should be added to clarify that a planning application is a potential route for the approval of a masterplan. We therefore propose the following additional sentence:</p> <p>"Whilst each proposal will be considered on its own merits, an appropriate mechanism for approving a masterplan can be through the planning application process."</p> <p>This would represent a minor change to an appendix to the plan, and reflects the substance of the discussions at the hearings. It could therefore be added without the need for further consultation.</p>

Comment ID	78
Response Date	15/12/2025 00:00:00
Consultee Family Name	Spode
Consultee Given Name	D & P
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 Land at Junction 16
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Re; Modifications to the draft local plan - AB2</p> <p>My wife and i strongly object to the proposed above development application on the points listed below:</p> <ol style="list-style-type: none"> 1) Emergency access Barthomley Road - phase 1 <ol style="list-style-type: none"> a) Barthomley Road is a narrow winding country road with three blind bends to the proposed access b) This quiet road is very popular with dog walkers, runners and horse riders so increased traffic would create dangers for members of the public c) it is totally unsuitable for large construction vehicles / HGVs and large amounts of traffic, two cars are unable to pass in many areas of the road, only 12 feet wide in places with no pavements and inadequate lighting. d) Most properties on Barthomley Road have a very limited view when exiting their drives which make it extremely dangerous for traffic on and entering the road. 2) We wish to highlight that AB2 (land at Junction 16 of M5/A500) is too large for this greenbelt area. There are a number of warehouses that were built under Cheshire East Council in the Alsager area a number of years ago and these still remain empty at the current time. Our question is why are more warehouses needed when recently built ones remain empty. 3) We express concern regarding the proposed emergency access road coming down Barthomley Road as i have raised on points 1a-1d above. How will this be managed - will it be for blue light emergency vehicles only or will it be an alternative access for HGVs and workers 4) Problems on the A500 and M6 currently directly impacts upon the existing rural road network and creates huge hazards on this virtually single track road with sat navs seeming to send vehicles down this road to rejoin the M6 at Sandbach or the A500 further down. 5) If a flyover is to be installed, again this would remove valuable greenbelt land and have a large impact on the current wildlife population, not to mention the huge financial cost for this to be built. <p>We would like AB3 to be removed from the local plan until accurate data can be accessed, monitored and analysed.</p>

Comment ID	106
Response Date	16/12/2025 10:24:00
Consultee Family Name	Stratton
Consultee Given Name	Catherine
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM70
Q4page - Page	50 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB15 ' land north of vernon avenue'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>To whom it may concern</p> <p>I object to AB15 proposal and I object to the changes made to AB15.</p> <p>The landscape modifications seem vague and unenforceable meaning which could result in builders ignoring the modification entirely.</p> <p>Removing SA1 will delete essential protections including traffic safety, which is essential for a very busy road.</p> <p>Audley was a key mining area, therefore, mining related ground risks required full investigation. Not just contamination checks.</p> <p>It's unacceptable to weaken the protection of the medieval field system. We should be protecting them.</p> <p>There was recently 39 homes approved to be built in the area, this would now reduce the need for AB15 to be built on.</p> <p>The modification does not safeguard residents and should not be accepted.</p>

Comment ID	67
Response Date	07/12/2025 12:45:00
Consultee Family Name	Stringer
Consultee Given Name	Edward
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM68
Q4page - Page	47 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 Supporting information
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I am writing to submit my thoughts on the Main Modifications raised in relation to the Newcastle-Under-Lyme Local Plan. As outlined in the consultation guidance this addresses comment in relation to the proposed modifications and not details previously raised and considered at the Regulation 19 stage.</p> <p>There are a number of modifications that very much benefit Audley Village/Parish. Modification MM05, specifically, reducing overall housing requirements, is welcomed and helps in the desire to keep Audley as a rural parish in nature.</p> <p>I do however have extremely strong concerns regarding the continued inclusion of site AB2 (Land at Junction 16 of the M6) within the Local Plan. MM67 and 68 modifications amend the policy but fundamentally do not resolve the considerable issues identified before by the Inspector during examination. The sheer scale of the development remains a core concern, and the fact that accurate and up-to-date highway figures are not included/used; and rather rely on the Indurent Traffic Assessment which is both outdated, and not indicative of current experiences.</p> <p>There are also concerns related to the uncertainty of deliverability of the project and lack of detail regarding mitigation.</p> <p>Undoubtedly this proposal if implemented would increase traffic in and around the area, the A500 itself and Junction 16 of the M6; which is persistently subject to extremely high levels of traffic, long delays, and in the past 12 months in particular an area of significant increases in vehicular collisions and accidents. This recent and up-to-date data should be considered.</p> <p>Another area of concern, which I have raised independently and directly with Indurent is the 'Emergency Access' to the AB2 site; it is paramount that it is explicitly agreed that such 'access' would be in genuine site emergency situations only, and not, as can be reasonably anticipated to become used as a 'rat-run' for alternative vehicular access for employees and HGV vehicles in the event of surrounding roads and access point be restricted/delayed due to traffic congestion on surrounding highway routes.</p> <p>Finally, whilst I am pleased that there is a requirement to provide a landscape and visual impact assessment; as somebody who lives extremely close to the proposed site, and who has contacted Indurent directly on this matter for further detail, my concerns remain strong.</p> <p>The historical green belt/site that would be irrevocably removed and replaced with manufactured "green corridors"; would without question undermine any 'landscape led' proposal that has been put forward.</p> <p>Given the points raised in relation to AB2, I request that the Planning Inspector withhold the Final Report and withhold approving any planning application related to this site, until the recommended modelling is completed and published , and all associated mitigation considered.</p>
Comment ID	50
Response Date	14/12/2025 12:45:00
Consultee Family Name	Stringer
Consultee Given Name	Edward
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM05
Q4page - Page	7 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD3 Distribution of Development
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support	<p>I am writing to submit my thoughts on the Main Modifications raised in relation to the Newcastle-Under-Lyme Local Plan. As outlined in the consultation guidance this addresses comment in relation to the proposed modifications and not details previously raised and considered at the Regulation 19 stage.</p>

the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	There are a number of modifications that very much benefit Audley Village/Parish. Modification MM05, specifically, reducing overall housing requirements, is welcomed and helps in the desire to keep Audley as a rural parish in nature.
Comment ID	66
Response Date	14/12/2025 12:45:00
Consultee Family Name	Stringer
Consultee Given Name	Edward
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>I am writing to submit my thoughts on the Main Modifications raised in relation to the Newcastle-Under-Lyme Local Plan. As outlined in the consultation guidance this addresses comment in relation to the proposed modifications and not details previously raised and considered at the Regulation 19 stage.</p> <p>There are a number of modifications that very much benefit Audley Village/Parish. Modification MM05, specifically, reducing overall housing requirements, is welcomed and helps in the desire to keep Audley as a rural parish in nature.</p> <p>I do however have extremely strong concerns regarding the continued inclusion of site AB2 (Land at Junction 16 of the M6) within the Local Plan. MM67 and 68 modifications amend the policy but fundamentally do not resolve the considerable issues identified before by the Inspector during examination. The sheer scale of the development remains a core concern, and the fact that accurate and up-to-date highway figures are not included/used; and rather rely on the Indurent Traffic Assessment which is both outdated, and not indicative of current experiences.</p> <p>There are also concerns related to the uncertainty of deliverability of the project and lack of detail regarding mitigation.</p> <p>Undoubtedly this proposal if implemented would increase traffic in and around the area, the A500 itself and Junction 16 of the M6; which is persistently subject to extremely high levels of traffic, long delays, and in the past 12 months in particular an area of significant increases in vehicular collisions and accidents. This recent and up-to-date data should be considered.</p> <p>Another area of concern, which I have raised independently and directly with Indurent is the 'Emergency Access' to the AB2 site; it is paramount that it is explicitly agreed that such 'access' would be in genuine site emergency situations only, and not, as can be reasonably anticipated to become used as a 'rat-run' for alternative vehicular access for employees and HGV vehicles in the event of surrounding roads and access point be restricted/delayed due to traffic congestion on surrounding highway routes.</p> <p>Finally, whilst I am pleased that there is a requirement to provide a landscape and visual impact assessment; as somebody who lives extremely close to the proposed site, and who has contacted Indurent directly on this matter for further detail, my concerns remain strong.</p> <p>The historical green belt/site that would be irrevocably removed and replaced with manufactured "green corridors"; would without question undermine any 'landscape led' proposal that has been put forward.</p> <p>Given the points raised in relation to AB2, I request that the Planning Inspector withhold the Final Report and withhold approving any planning application related to this site, until the recommended modelling is completed and published , and all associated mitigation considered.</p>

Comment ID	140
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM07
Q4page - Page	7 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD4 Development Boundaries and the Open Countryside
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM07 We support the inclusion of this amendment.</p>
Comment ID	144
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM38
Q4page - Page	27 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 10 Infrastructure and Transport
Q4policypara - Policy / Paragraph	IN6 Telecommunications Development
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM38 We support the inclusion of this amendment.</p>
Comment ID	148
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM55

Q4page - Page	37 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4polycypara - Policy / Paragraph	SE9 Supporting Information
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM55 We note the amendments made to the Plan in respect of the historic environment. We do consider that many of these references would be more suited to being within the policy text itself and that the message at the beginning of the justification text should be clear that harm to the significance of heritage assets will be resisted.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above.You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We note the amendments made to the Plan in respect of the historic environment. We do consider that many of these references would be more suited to being within the policy text itself and that the message at the beginning of the justification text should be clear that harm to the significance of heritage assets will be resisted.
Comment ID	152
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylorson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM65
Q4page - Page	45 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 12 Rural Matters
Q4polycypara - Policy / Paragraph	RUR5 Re-use of Rural Buildings for Residential Use
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM65 We support the inclusion of this amendment.</p>
Comment ID	142
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylorson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM26

Q4page - Page	21 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 9 Retail
Q4policypara - Policy / Paragraph	RET2 Shop Fronts, Advertisements, New Signage
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM26 We support the inclusion of this amendment.</p>
Comment ID	141
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM10
Q4page - Page	10 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 5 Planning for Sustainable Development
Q4policypara - Policy / Paragraph	PSD7 Design
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM10 We support the inclusion of this amendment.</p>
Comment ID	145
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM39
Q4page - Page	27 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 10 Infrastructure and Transport
Q4policypara - Policy / Paragraph	IN7 Utilities
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>s the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM39 We support the inclusion of this amendment.</p>
Comment ID	149

Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM62
Q4page - Page	44 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 12 Rural Matters
Q4polycypara - Policy / Paragraph	RUR1 Rural Economy
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM62 We note the removal of this clause and the reference to historic farmsteads within accompanying text to Policy SE9.</p>
Comment ID	143
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM29
Q4page - Page	22 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 9 Retail
Q4polycypara - Policy / Paragraph	RET5 Kidsgrove Town Centre
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM29 We support the inclusion of this amendment.</p>
Comment ID	147
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM54
Q4page - Page	36 of Schedule of Main Modifications

Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4polycypara - Policy / Paragraph	SE9 Historic Environment
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM54 We note the amendments to reflect the National Planning Policy Framework (NPPF) wording. Historic England did provide a Statement of Common Ground with the Council to consider how our representation may be overcome in the Plan.</p>
Comment ID	151
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylorson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM64
Q4page - Page	45 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 12 Rural Matters
Q4polycypara - Policy / Paragraph	RUR4 Replacement Buildings Outside of Settlement Boundaries
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM64 We support the inclusion of this amendment.</p>
Comment ID	146
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylorson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM42
Q4page - Page	30 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 11 Sustainable Environment
Q4polycypara - Policy / Paragraph	SE1 Supporting Information
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM42 Should be clear that this relates to the significance of heritage assets, including their setting. It could relate wider than to historic buildings only.</p>

Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	Should be clear that this relates to the significance of heritage assets, including their setting. It could relate wider than to historic buildings only.
Comment ID	150
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM63
Q4page - Page	45 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 12 Rural Matters
Q4policypara - Policy / Paragraph	RUR3 Extensions and Alternations to Buildings Outside Settlement Boundaries
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM63 We support the inclusion of this amendment.</p>
Comment ID	154
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM121
Q4page - Page	75 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Appendix 8
Q4policypara - Policy / Paragraph	Appendix 8
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM121 We are disappointed to see a generic paragraph relating to the historic environment and site allocation considerations. We favour the approach where individual site allocations highlight the specific considerations required for the historic environment. We consider a site specific approach provides more clarity to a prospective developer and a greater opportunity for issues to be considered by Council officers.</p>

Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	We favour the approach where individual site allocations highlight the specific considerations required for the historic environment. We consider a site specific approach provides more clarity to a prospective developer and a greater opportunity for issues to be considered by Council officers.
Comment ID	153
Response Date	17/12/2025 14:28:00
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69 onwards
Q4page - Page	48 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB12
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on this consultation, at this time.</p> <p>Historic England are grateful to have a positive working relationship with Newcastle under Lyme Council, and to have prepared a Statement of Common Ground with the Council, to set out an agreed way forward with our representation. We note that the Main Modifications consultation diverts from this agreed way forward in respect of Policy SE9, accompanying justification text and site specific policies.</p> <p>MM69 onwards We are unclear why the site specific policies have been deleted from the Plan, including important locally specific heritage references informed by the Heritage Impact Assessment. MM87 however, has incorporated a clause relating to archaeology so it is not clear on the rationale for when considerations are included and when they have been deleted.</p>

Comment ID	55
Response Date	12/12/2025 10:30:00
Consultee Company / Organisation	Music Venue Trust
Consultee Position	National Co-ordinator
Consultee Family Name	Taylor
Consultee Given Name	Jay
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM – SE12 (Criteria 3 deletion)
Q4page - Page	19/20
Q4chap - Chapter, Appendix Number or Map Inset	SE12: General Amenity
Q4policypara - Policy / Paragraph	Deletion of Criteria 3
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>The deletion of criteria 3 from Policy SE12 makes the policy less explicit, less effective, and inconsistent with national and local policy, and is therefore unsound. Criteria 3 previously stated:</p> <p>“Where significant adverse effects cannot be effectively mitigated, and no acceptable compromise in operations can be reached, planning permission will be refused.”</p> <p>Removing this wording weakens the assuredness needed when dealing with developments located nearby existing noise-generating uses such as grassroots music venues. The explicit reference to refusal where mitigation is not possible is important for ensuring the Agent of Change principle within National Planning Policy Framework is properly upheld.</p> <p>Music Venue Trust would like to take this opportunity to emphasise that planning policy must clearly state that permission should not be granted where noise mitigation cannot fully protect future residents without placing unreasonable restrictions on existing cultural premises, including grassroots music venues. Without this clarity, proximity of new residential units would place the future of this Grassroots Music Venue under sustained risk of permanent closure, undermining the Agent of Change principle set out in national and local planning policy. Moreover, it would result in residential properties with unacceptable amenity and residential quality.</p> <p>Music Venue Trust believes that criteria 3 of Policy SE12 helps to demonstrate the absolute need to fully address agent of change issues, such as potential noise disturbance for future residents from noise from a music venue. This issue is critical to the survival of existing grassroots music venues, such as The Rigger (Marsh Parade, Newcastle Under Lyme, ST5 1BT). The wording should be reinstated to give extra strength and clarity to the policy.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The deleted wording should be reinstated in full to ensure the policy remains clear, enforceable, and aligned with the Agent of Change principle. Suggested wording to reinstate:</p> <p>“Where significant adverse effects cannot be effectively mitigated, and no acceptable compromise in operations can be reached, planning permission will be refused.” Reinstating this clause restores essential clarity about how decision-makers should act when mitigation is not achievable. It also ensures the Local Plan remains consistent with national policy, provides certainty for both developers and existing businesses, and protects Newcastle-Under-Lyme’s established cultural venues from unmanageable planning conflicts.”</p>

Comment ID	81
Response Date	16/12/2025 10:19:50
Consultee Family Name	Timms
Consultee Given Name	Andrew
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	64
Q4chap - Chapter, Appendix Number or Map Inset	Policy AB2
Q4policypara - Policy / Paragraph	Land at Junction 16 of the M6
Q5LegallyCompliant - Legally compliant	No
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Key Concerns:</p> <ol style="list-style-type: none"> 1 Impact on Local Rural Amenity and Land Use The development of the AB2 site would severely degrade the existing rural character of the area. This includes: <ul style="list-style-type: none"> • The irreversible loss of a large expanse of rural land, which currently contributes to the local amenity and landscape. • The removal of productive agricultural land from the food supply chain, reducing local food production capacity and undermining sustainability goals. These changes would disproportionately affect the surrounding rural community, transforming a peaceful, green area into an industrial zone without adequate justification or mitigation. 1 Traffic and Infrastructure Pressures The proposed industrial employment site is projected to accommodate up to 3,500 employees, placing unsustainable pressure on local roads and the village infrastructure. Key issues include: <ul style="list-style-type: none"> • Existing high levels of congestion and accidents on the A500 and M6 junction, which are already at capacity. • Reliance on a single access point from the A500/M6, creating a critical pinch point for traffic flow. • Inevitable spillover effects during peak times or incidents, where employees may attempt to access the site via narrow, single-track country lanes such as Park Lane, Moat Lane, and Barthomley Road. This could involve parking vehicles in these lanes to use pedestrian entrances, bypassing main road congestion. • Even a minor disruption affecting just 10% of staff could result in approximately 350 vehicles using these lanes, leading to gridlock, safety hazards, and inaccessibility for residents. • Increased risks to vulnerable road users, including pedestrians, cyclists, horse riders, elderly individuals, and those with physical or sensory impairments. These lanes are heavily used for recreational purposes, and any designation as an emergency route for the site would be negligent and likely result in casualties during high-traffic or emergency scenarios. • Potential for employees to routinely park in the lanes and walk to the site to shorten commutes, further exacerbating dangers and rendering the lanes unsuitable for residents, recreational users, or emergency access. To mitigate some congestion, infrastructure improvements such as a flyover may be required to separate A500 access from M6 traffic. However, this would not address the core issue of unauthorized lane usage during frequent A500/M6 standstills, which occur regularly. 1 Flooding and Environmental Risks The AB2 site, particularly areas adjacent to Moat Lane, encompasses an ancient moat with persistent, year-round flooding issues. The existing road infrastructure is in poor condition and frequently closed for repairs due to flood damage. Development would worsen these problems through: <ul style="list-style-type: none"> • Replacement of absorbent grassland with impermeable buildings and roads, reducing natural water absorption during heavy rainfall. • Proposed earth mounds that would redirect surface water onto surrounding roads and properties, intensifying flood events. • Heightened flood risk to nearby properties, which are already difficult to access during heavy rain and could become fully inaccessible at times. • Potential for structural damage to buildings and increased property risks from exacerbated flooding. These environmental impacts highlight the site's unsuitability for large-scale development, as they would compound existing vulnerabilities without feasible remediation. <p>Conclusion The AB2 site should be excluded from the local plan due to its profound negative impacts on rural amenity, traffic safety, infrastructure capacity, and flood resilience. The scale of the proposal is disproportionate to the surrounding rural environment, and existing opposition from the community has not been adequately addressed. Approval would prioritize developer interests over local well-being, sustainability, and safety. I urge the council to reconsider and remove AB2 from the plan to prevent these irreversible harms.</p>

	<p>Whilst the Planning Inspector expressed serious concerns about the scale of the AB2 development at the junction of the A500 and M6, she has given the benefit of the doubt to the Borough Council and, unfortunately, AB2 is still in the Plan.</p> <p>We welcome and support the need for a micro-simulation model of the impact on our highways (AB2 para7) but feel that, as the access needed is likely to be a flyover (every junction on the A500 in Staffordshire is grade-separated, i.e. on two levels, other than the first ... which is a very large roundabout) the cost of this may impact the viability of the site and, therefore, this should be undertaken BEFORE the Local Plan is adopted.</p> <p>Any mitigation measures need to take the following into account: The need to recognise the scale of the current problems and that the traffic figures submitted by the developers are way out of date and, therefore, any projections are severe under-estimates. Let them know of the problems you experience. The need to define what emergency use of Moat Lane is: It should be limited to emergency vehicles and not HGVs and employee's cars when the A500 access is inoperative. AB2 para 13: The need to state how they will discourage routing of traffic past Black Firs and Craddock's Moss SSSIs. This should be shown BEFORE the Local Plan is adopted to ensure that the measures will genuinely protect these invaluable sites. We support the requirement for a landscape and visual impact assessment (AB2 para 9). Regarding AB2 para 15: PAPG objects to the removal of the large green space between footpaths Audley 9 and 22 and substitution with green corridors: these corridors will not enhance public rights of way (being hemmed in by giant warehouses) and will ensure the loss of farmland birds on this site (they need open fields, not hedge lined footpaths).</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.	<p>The AB2 site should be excluded from the local plan due to its profound negative impacts on rural amenity, traffic safety, infrastructure capacity, and flood resilience. The scale of the proposal is disproportionate to the surrounding rural environment, and existing opposition from the community has not been adequately addressed. Approval would prioritize developer interests over local well-being, sustainability, and safety. I urge the council to reconsider and remove AB2 from the plan to prevent these irreversible harms.</p> <p>Require a full investigation, not just a contamination check, of mining-related ground risks. Undertake the micro-simulation model of the impact on our highways BEFORE the Local Plan is adopted. Define emergency use of Moat Lane to be limited to emergency vehicles only. State how routing of traffic past Black Firs and Craddock's Moss SSSIs will be discouraged BEFORE the Local Plan is adopted. Retain the large green space between footpaths Audley 9 and 22 instead of substituting with green corridors to protect public rights of way and farmland birds.</p> <p>These changes are necessary to ensure the modification is sound (justified, effective, and consistent with national policy) by addressing under-estimated traffic impacts, environmental protections, and community safety, making the plan deliverable and sustainable.</p>
FileAttachment - 8. If you have a filled-in representation form or other file that you wish to attach, you may add it here:	remove-6549165
Comment ID	126
Response Date	17/12/2025 11:41:00
Consultee Family Name	Timms
Consultee Given Name	Andrew
Q4ref - MM Reference	MM67
Q4page - Page	46 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 (land at Junction 16)
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Hi Allan,</p> <p>Thank you for confirming the upload.</p> <p>On a separate note last spring I spotted what has been confirmed as an adolescent female or eft great crested newt.</p> <p>I took three photos and left it in situ not touching or disturbing it. I registered the find with the wildlife trust but have not heard anything back. Does the council or planning department take note of such finds? If so please find attached my photos. These photos were taken in my property entrance (Redacted by admin) in near an area prone to flooding, hence the ideal habitat for the great crested newt family.</p> <p>I have other pictures of previous spots of endangered species on the property and the opposite AB2 site, including more newts if they are of interest.</p> <p>Many thanks for your consideration, I look forward to your reply.</p>
FileAttachment - 8. If you have a filled-in representation form or other file that you wish to attach, you may add it here:	remove-6549536
Attachments	1339509 photos.001.jpeg

Comment ID	129
Response Date	16/12/2025 16:56:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Position	Head of Economic Growth and Delivery
Consultee Family Name	Vining
Consultee Given Name	Jonathan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM71
Q4page - Page	50 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4polycypara - Policy / Paragraph	AB33
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We object to the removal of this site and believe its exclusion from the Plan is not a matter of Soundness for the reasons set out below.</p> <p>The made Neighbourhood Plan for Audley Parish identified a housing need for the Parish of 275 homes, commensurate with the original wording of 'Policy PSD3: Distribution of Development' that set out Audley and Bignall End should accommodate in the order of 250 dwellings. The Neighbourhood Plan also identified that capacity for 121 dwellings existed within the settlement boundary leaving a shortfall of 149, which could only be met through Green Belt release. Amendments to the Green Belt boundary to facilitate development to meet the local housing need were not proposed in the Neighbourhood Plan instead it stated these would be addressed by the Local Plan. Removal of the Green Belt allocations from Audley and Bignall End means the Parish cannot meet its local housing need.</p> <p>In the Post Hearing Advice letter to the Borough Council dated 1 August 2025 the Inspector notes '<i>The SFRA2 identifies surface water flooding constraints for the site. This reflects anecdotal evidence from residents and Google earth images of the site.</i>' Whilst the SFRA2 did identify the site is affected by surface water flooding it stated '<i>the risk is minimal and confined to the centre of the site in the 3.3% and 1% AEP events.</i>' It is accepted that the current Google Earth image shows presence of flood water, which was also present at the time of the examination.</p> <p>However, the occurrence of this flooding episode is not representative of the typical conditions of the site. The flooding on site that was observed recently was due to a lack of land drain maintenance of the former tenant's tenure and actions by a trespasser taking occupation more recently. We will be taking action to remedy the issue in due course. We have older satellite imagery showing the field free of standing water. Also, Google street view can be used to view the site from Park Lane showing no indication of flooding activity in September 2023, May 2021, July 2019 and June 2009. These are more representative of our experience of the land and how it would typically be seen with the drainage system working properly. We therefore contend the flood risk has been misrepresented and, as per the SRFA2, development of the site could take place subject to a site specific Flood Risk Assessment and appropriate surface water management and SuDS in place. All of which can be addressed at the development management stage.</p> <p>The inspector's second concern was '<i>the site as proposed would not provide a defensible boundary to the Green Belt to the north of the site.</i>' We accept this position. However, it should be noted that the land to the north in the form of site AB32 had been promoted for development but had no direct means of access. We had advised the Council that we were more than willing to facilitate access to AB33 via our site. Combining AB33 and AB32 in our view would have provided for a better scheme overall, including setting a defensible green belt boundary with Alsager Road to the north. The western boundary of the site already provides a defensible boundary via the existing mature hedgerow, which incorporate several hedgerow trees. Any gaps could be reinforced through strategic planting as part of the development requirements for the site.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised	<p>Reinstatement of Site AB33 to the plan and associated policies.</p> <p>Consideration of incorporation of AB32 into the allocation to provide a defensible green belt boundary.</p>

wording of any policy or text. Please be as precise as possible.	
Comment ID	127
Response Date	16/12/2025 16:56:00
Consultee Company / Organisation	Staffordshire County Council
Consultee Position	Head of Economic Growth and Delivery
Consultee Family Name	Vining
Consultee Given Name	Jonathan
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM69
Q4page - Page	48 of Schedule of Main Modifications
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB12
Q5LegallyCompliant - Legally compliant	Yes
Q5Sound - Sound	No
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>We object to the removal of this site on several grounds as set out below and believe exclusion of the site from the Plan was not justified and now brings into question the Soundness of the Plan.</p> <p>The made Neighbourhood Plan for Audley Parish identified a housing need for the Parish of 275 homes, commensurate with the original wording of 'Policy PSD3: Distribution of Development' that set out Audley and Bignall End should accommodate in the order of 250 dwellings. The Neighbourhood Plan also identified that capacity for 121 dwellings existed within the settlement boundary leaving a shortfall of 149, which could only be met through Green Belt release. Amendments to the Green Belt boundary to facilitate development to meet the local housing need were not proposed in the Neighbourhood Plan instead it stated these would be addressed by the Local Plan. Removal of the Green Belt allocations from Audley and Bignall End means the Parish cannot meet its local housing need.</p> <p>The allocation of AB12 provided for a sensible rounding off of the green belt boundary, tying in with the built form from Diglake Street to Hope Street. The site can also deliver against all of the policy requirements for sites released from the Green Belt, as demonstrated via submissions to the Borough Council.</p> <p>The site was known to have complicated highway access arrangements due to the nature of terraced street patterns in the historic centre of the village. However, we challenge the rationale that concerns over highway matters are reason enough to remove the site as an allocation and should have been left to the development management stage.</p> <p>The proposal was supported by high level transport evidence demonstrating that a suitable form of access could be taken to the site from Diglake Street, with the potential for an additional active travel mode access point to Raven's Lane that could also act as an emergency vehicular access. It was recognised that in taking access from Diglake Street it would increase traffic flow in a locality that has limited off-street parking potentially leading to increased incidence of vehicles travelling in opposite directions being unable to pass and one having to reverse.</p> <p>To address this situation two proposals were suggested to the Borough Council. First, the allocation site could provide parking for some residents of Diglake Street either through provision to the rear of properties or a parking court. The precise nature of provision would be determined through detailed design and liaison with the local community. Second, the allocation could fund the design and delivery of highway improvements to Diglake Street and Albert Street forming a one-way loop to completely remove any incidence of vehicles travelling in opposite directions coming into conflict with one another. This again would be discussed with the local community, but considering the make-up of Diglake Street and Albert Street with limited options for turning manoeuvres and few properties with off-street parking it is likely that most residents are already using the streets in this manner i.e. egressing via the opposite street they entered from. It is therefore considered that the formation of a one-way system would not be an inconvenience and benefit the majority of existing residents.</p> <p>Furthermore, the site has been assessed by the Local Highway Authority, who set out criteria that would need to be addressed by the development but notably did not raise any concerns that there were any showstoppers or insurmountable issues. Removal of the site from allocation on highway grounds, going against the expert opinion of the Local Highway Authority we therefore believe is unjustified.</p> <p>We are also aware from discussions with the Parish Council during the preparation of the Neighbourhood Plan that the community expressed a desire for provision of more accommodation options for older persons. The provision of such accommodation e.g. Extracare would typically generate fewer traffic movements than general market dwellings and would therefore further lessen impact on amenity of local residents. We would be happy for Policy to stipulate that provision of this nature should be considered ahead of market/family dwellings.</p>
Q7Modification - 7. Please set out the change(s) to the Proposed Modification you consider is	Re-inclusion of Site AB12 and associated Policies to the Local Plan and amendment to PSD3 to reflect the level of housing distribution to Audley and Bignall End.

<p>necessary to make it legally compliant and sound, in respect of any legal compliance or soundness matters you have identified in the question above. You will need to say why each change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>	<p>Additions to the previously drafted policy for AB12 to require the site to first consider the provision of accommodation for older persons before traditional market housing.</p>
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Comment ID	71
Response Date	15/12/2025 15:07:00
Consultee Family Name	Whitney
Consultee Given Name	Claire
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	13 Site Allocations
Q4policypara - Policy / Paragraph	AB2
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Good morning,</p> <p>For consideration in relation to the NULBC Final Local Plan modification Policy AB2 - land adjacent to M6 J16.</p> <p>I understand that Planning Inspector Jordan has requested a Micro-Simulation exercise be completed and reviewed. It is vital that the resulting data is accurate and up to date, giving a true reflection of the circumstances and impact. Relying on data in the Indurent Traffic Assessment is inappropriate and inadequate.</p> <p>I am deeply concerned about the significant increase in traffic in the Audley area if AB2 goes ahead. I have had a car written off whilst parked outside my house, on our busy road where I have suggested to my MP that there be traffic calming measures introduced especially as we are close to a school. Neighbours have had cars damaged and another written off due to traffic on the road. The AB2 proposal increases the risk of more incidents and therefore more expense for our community due to car repairs, replacements (as there is not a comprehensive public transport network serving the area) and increased insurance premiums.</p> <p>The standard of road surfaces are already regularly low. The AB2 development would cause even more traffic which will cause more damage, making driving conditions more dangerous and causing more damage to cars.</p> <p>The current high profile incidents at the Audley/Alsager Road and A500 junction highlight that traffic volume and speed is a serious issue locally. AB2 would add to these problems where lives are at risk.</p> <p>When there is a problem on the M6 around J15/16 the A500 gets busier than usual and Audley and Newcastle A34 routes become congested and at times standstill. This is bad for local traffic delays and for local pollution. AB2 would compound these problems.</p> <p>I implore you to consider these issues and all raised by the community.</p>

Comment ID	201
Response Date	17/12/2025 23:39:00
Consultee Family Name	Williams
Consultee Given Name	Janet
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM70
Q4page - Page	50 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	Ab15 Land North of Vernon Avenue
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	I object to the proposal of building on this site, the access is through an already busy avenue that is constantly double parked and is access to several roads with problems caused to local residents Also worryingly is that it appears that there is loss of safeguarding sa1. The land will not have a correct assessment which will not show the impact from lack of protection for the medieval field system along with weakened landscape which means the developer will not be required to add trees footpaths or anything to enhance the area, this area can also flood regularly. Planning permission has already been granted for 39 houses in the local area, so the local housing plan does not require to build as many houses so can protect this field
Comment ID	202
Response Date	17/12/2025 23:39:00
Consultee Family Name	Williams
Consultee Given Name	Janet
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of Modifications Schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 'land at J16'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible.If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	I am writing to protest about about this proposal, as someone who lives locally I know how often this area gets congested and at a standstill, I do not believe that this will promote jobs due to the manner of what they plan to do, but it will definitely destroy prime farming land which once destroyed will never return and in this present ongoing world unease we should be as self sufficient as possible with less carbon footprint. Wildlife and eco systems will be destroyed, plus there are several empty new warehouses already to move into, on a final note i do not see how you can use this site due to the terrible area proposed for entry and exit, if you look at the layout you'll see that you'll have no direct access or exit and that means going to the nearest entry and excess point which will cause further problems and delays

Comment ID	168
Response Date	17/12/2025 10:32:00
Consultee Family Name	Wright
Consultee Given Name	Teresa and Dave
Q3Document - 3. Name of the Document to which this representation relates?	Schedule of Proposed Main Modifications
Q4ref - MM Reference	MM67
Q4page - Page	46 of modifications schedule
Q4chap - Chapter, Appendix Number or Map Inset	Chapter 13 Site Allocations
Q4policypara - Policy / Paragraph	AB2 'land at J16 of M6'
Q6Details - 6. Please give details of why you consider the Proposed Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Modification, please also use this box to set out your comments.	<p>Newcastle Under Lyme Local Plan - Main Modifications Consultation</p> <p>We welcome the following modifications:</p> <ul style="list-style-type: none"> • The removal of AB12 Diglake Street - 125 houses • AB33 Nantwich Road - 55 houses. • CT1 RedStreet – 530 houses. <p>We believe that if these were built, that there would be a huge amount of extra pressure on the local roads and infrastructure around Audley village, including the main arterial roads that bring the traffic into the village, especially the A500.</p> <p>The AB2 development</p> <p>The AB2 development at the junction of the A500 and M6, is however, the plan that concerns us the most due to its size, location and complexity. We welcome the pause and review approach of the planning inspector, and would like to contribute to the debate.</p> <p>(Para7 AB2) Due to a particular concern regarding the impact on our local highways of such an enormous structure, and the amount of cars and heavy goods vehicles that potentially will be accessing and departing the site at all hours of the day and night, we welcome the proposal to perform a micro-simulation model that will assess the impact of the changes needed to supply the site. We are of a strong belief that this must be undertaken before a decision is made on the inclusion of AB2 into the local plan. The likelihood is that a major modification of the roundabout at Junction 16 of the M6 will need to be built, due to the current traffic build ups that already create long hold ups and waiting times. This will obviously have a large impact on the cost of the whole project. The proposal to use Moat Lane as an emergency route needs clarification, as the proposed restrictions on use, easily be ignored by traffic from the local villages and towns that would normally use this route rather than taking a long detour on the A500.</p> <p>Any mitigation measures need to take the following into account:</p> <ul style="list-style-type: none"> • The need to recognise the scale of the current problems and that the traffic figures submitted by the developers are way out of date and, therefore, any projections are severe under-estimates. When travelling to Cheshire East from Audley I regularly spend time waiting in queues due to the volume of traffic using this roundabout. • The need to define what emergency use of Moat Lane is: It should be limited to emergency vehicles and not HGVs and employee's cars when the A500 access is inoperative. • AB2 para 13: The need to state how they will discourage routing of traffic past Black Firs and Craddock's Moss SSSIs. This especially should be shown prior to the adoption onto the Local Plan, to ensure that the measures will genuinely protect these invaluable sites. <p>We support the requirement for a landscape and visual impact assessment (AB2 para 9). And object to the removal of the large green space between footpaths Audley 9 and 22 and substitution with green corridors (AB2 para 15), these corridors will not enhance public rights of way hemmed in by giant warehouses, and will ensure the loss of farmland birds on this site as they need open fields, not hedge lined footpaths.</p>