



Newcastle-under-Lyme Borough Council



Main Modifications Consultation Report

January 2026

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1. Introduction

- 1.1. The Newcastle-under-Lyme Local Plan (2020-2040) was submitted to the Secretary of State for independent examination on the 20 December 2024. Public examination hearings were held during May and June 2025, led by government appointed Planning Inspector A Jordan (BA Hons) MRTPI.
- 1.2. The Local Plan (2020-2040) will set out the spatial strategy for the Borough. It will also include a suite of policies and allocations to support the delivery of the strategy for the Borough. Once adopted, the Local Plan will replace the current development plan for the Borough, which is the joint core strategy with Stoke-on-Trent City Council from 2009 and saved policies from the Newcastle-under-Lyme Local Plan from 2003.
- 1.3. Following the examination hearing sessions, several amendments, known as Main Modifications, which are necessary to make the Plan sound and legally compliant were consulted on from Wednesday 5 November 2025 to Wednesday 17 December 2025.
- 1.4. This consultation report seeks to summarise: -
 - The stakeholders invited to take part in the consultation on the Main Modifications.
 - The consultation and publicity methods used.
 - The material that was subject to consultation.
 - A summary of the issues received.
 - A response from the Council on the main issues received.
- 1.5. The Council's Statement of Community Involvement (SCI) sets out how the Council will involve sectors of the community in the planning process. The SCI¹ has been followed in undertaking the consultation on the Schedule of Main Modification's consultation, although it is noted that this is a technical stage of consultation as part of the examination of the Local Plan.

2. Plan production timeline

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

Table 1: Plan Production Timeline

Consultation	Scope	Dates
Issues and Strategic Options Consultation	The Issues and Strategic Options document identified key planning issues facing the borough	01 November 2021 – 24 January 2022

¹ <https://www.newcastle-staffs.gov.uk/downloads/download/142/statement-of-community-involvement>

	over the next Local Plan period (to at least 2040), potential options to address them and suggested policy options.	
Draft Sustainability Appraisal Scoping Report	The Sustainability Appraisal Scoping report identified the scope and level of detail of information to be included in the Sustainability Report inline with relevant regulatory requirements	
Call for Sites, including Brownfield Call for Sites	The call for sites invited residents, landowners, developers, and other parties to put forward sites for consideration through the Local Plan process for housing, employment, or other development (including Gypsy and Traveller sites)	01 November 2021 – May 2024 Dedicated brownfield call for sites from the 8 November 2022
First Draft Local Plan Consultation	The First Draft Local Plan set out a preferred option for growth plan with preferred site allocations and draft policies	19 June 2023 – 14 August 2023
Final Draft Local Plan	The Final Draft Local Plan set out final site allocations and policies to be submitted for examination by the Planning Inspectorate.	12 August 2024 – 7 October 2024
Local Plan Examination	Inspector A Jordan (BA Hons) MRTPI was appointed to consider the local plan and its supporting evidence to decide whether the plan meets the soundness and legal compliance tests.	20 December 2024 - ongoing
Local Plan Main Modifications Consultation	A schedule of main modifications alongside proposed changes to the Policies Map alongside an updated Sustainability Appraisal and Habitats Regulations Assessment document which follow	5 November 2025 – 17 December 2025

	the examination process to date, including public examination hearing sessions held in May/June 2025.	
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3. Summary of process and main issues

3.1. The Council consulted on the following documents

- Schedule of Proposed Main Modifications to the Submitted Local Plan – which sets out changes arising through the examination process that are considered to be necessary for the Local Plan to be sound, legally compliant and capable of adoption.
- Policies Map Modifications – which shows proposed changes to the Policies Map
- Sustainability Appraisal of the Main Modifications – assesses the extent to which proposed modifications help achieve relevant environmental, social and economic objectives
- Habitats Regulations Assessment of Main Modifications – the impact of the modifications on internationally-designated nature conservation sites

3.2. In addition, the following supporting documents were also published: -

- Schedule of proposed additional modifications – the additional modifications represent minor clarifications and formatting / factual corrections, which were published for information, alongside the Schedule of Main Modifications.
- Tracked change version of the Local Plan – showing the proposed Main and Additional Modifications as tracked changes to the submitted version of the Local Plan.

3.3. Copies of the consultation documents were made available on the Council's website and in hard copy form in Council offices, libraries and customer service centres located across the Borough.

3.4. The Council maintains a database of stakeholders who have responded to the Local Plan previously or have asked to be notified about the Local Plan. E-mails and / or letters were sent out to notify consultees on the database about the consultation. E-mail notifications were also sent to local Councillors, Town and Parish Councils and Members of Parliament (MPs) whose constituencies lie partly or wholly within the Newcastle-under-Lyme Borough Council's administrative area

3.5. The Local Plan Main Modifications consultation featured in a press release article published by the Council:- <https://www.newcastle-staffs.gov.uk/news/article/457/local-plan-amendments-back-for-public-consultation>

3.6. A total of 197 representations were received from 71 respondents during the consultation on the schedule of main modifications. Two separate responses were received after the consultation date but are not summarised in this consultation report. They included objections to site AB2 and comments relating to Policy SE11 (Trees, hedgerows and woodland).

3.7. No representations were received to the following proposed modifications: -

- MM15 (HOU2 Housing Mix and Density)
- MM16 (HOU3 Housing Standards)
- MM18 (HOU6 Self Build and Custom Dwellings)
- MM19 (HOU7 Homes in Multiple Occupation)
- MM20 (HOU8 Rural and First Homes Exception Sites)
- MM21 (HOU8, Rural and First Homes Exception Sites, Supporting Text)
- MM22 (EMP1 Employment)
- MM24 (EMP3 Tourism)
- MM25 (RET 1 Retail)
- MM28 (RET4 NUL Town Centre)
- MM31 (IN1 Infrastructure, Supporting Information)
- MM34 (IN4 Cycleways, Bridleways and PROW)
- MM35 (IN4 Cycleways, Bridleways and PROW Supporting Text)
- MM36 (IN5 Provision of Community Facilities)
- MM37 (IN5 Provision of Community Facilities, Supporting Text)
- MM40 (IN7 Utilities, Supporting Text)
- MM43 (SE2 Land Contamination)
- MM44 (SE3 Flood Risk Management)
- MM48 (SE5 Water Resources and Water Quality)
- MM50 (SE6 Open Space, Sports and Leisure Provision)
- MM52 (SE7 Biodiversity Net Gain, Supporting Text)
- MM56 (SE10 Landscape)
- MM58 (SE11 Trees, Hedgerows, Supporting Text)
- MM72 (BW1 Chatterley Valley)
- MM74 (CH13 Castletown Grange)
- MM75 (CH14 Maryhill Day Centre, Supporting Text)
- MM76 (CT20 Rowhurst Close)
- MM79 (KG6 William Road)
- MM80 (G&T 11 Land at Hardings Wood Road)
- MM82 (KS11 Knutton Community Centre)
- MM83 (KS17 Knutton Recreation Centre)
- MM84 (KS18 Land North of Lower Milehouse Lane)
- MM85 (KS19 Land at Knutton Lane)
- MM88 (NC13 Land West of Bullockhouse Road)
- MM89 (SP2 Cheddar Drive)

- MM92 (Former Playground, Ash Grove)
- MM94 (SP23 Land at Cemetery Road, Supporting Text)
- MM96 (BL8 Land adj to roundabout at West Avenue)
- MM98 (BL18 Land at Clough Hall, Supporting Text)
- MM99 (BL32 Land at Congleton Road)
- MM100 (TK6 Coalpitt Hill)
- MM102 (TK10 Crown Bank, Supporting Text)
- MM105 (TB6 Former Pool Dam Pub Site)
- MM109 (TB23, Galingale View, Supporting Text)
- MM110 (TC7 Ryecroft)
- MM111 (TC19 Hassell Street)
- MM112 (TC20 King Street)
- MM113 (TC22 Marsh Parade)
- MM114 (TC40 Blackfriars Road)
- M115 (Policy TC45 York Place)
- MM116 (TC45, Supporting Text)
- MM117 (TC50 Land at Cherry Orchard)
- MM118 (TC52 Goose Street)
- MM119 (TC71 Midway Car Park)
- MM120 (Appendix 6, Indicative Housing Trajectory)

4. Annex 1: Schedule of Proposed Main Modifications to the Submitted Local Plan

1. MM01 Strategic Objectives for the Borough

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Planning team at the Coal Authority have no specific comments to make on the schedule of Main Modifications	Noted	No further change	The Coal Authority
Overarching response to Local Plan consultations on the importance of the existing built environment and traditional vernacular architecture.	The response did not address the Main Modifications.	No further change	David Barton (Community Campaigner)
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 strategic road network.	The support for the additional strategic objectives is noted with regard to their positive reinforcement of sustainable travel.	No further change	National Highways
The allocation of the Talke sites (TK sites) is contrary to the Strategic Objectives, including as modified	Noted. Defer to those comments made to Talke specific sites, namely: MM101 (TK10 Crown Bank), MM103 (TK17 Land off St Martin's Road) and MM104 (TK27 Land off Coppice Road).	No further change	Talke Action Group / K Burgess

2. MM02 Local Plan Key Diagram

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
In relation to site CT1 'land at Red Street'. The site promotor has submitted viability and technical evidence to support the allocation of site CT1.	Please see response to MM73.	No further change	Fradley BJ, Grant Anderson Hill Dickinson

3. MM03 (PSD1 Overall Development Strategy)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Chatterley Valley / Radway Green (Alsager) (employment sites) are in close proximity to the site and will provide for future employment needs.	The response did not directly address the Main Modifications. The Chatterley Valley site, located in the Borough is included in the Council's employment land supply [Table 1, pg 3 of the employment land clarification note, ED039 & Table 1a of MM04]. Radway Green (Alsager) is in Cheshire East and contributes towards the needs identified in the Cheshire East Local Plan Strategy.	No further change	Dr J Austin
The Council should identify and allocate additional sites that are demonstrated to be deliverable in the first 5 years of the Plan Period.	Paragraph 5.4 of the Local Plan, as modified, notes that the Council has a housing land supply buffer of circa 5% above the housing requirement set out in the Plan.	No further change	Persimmon Homes Limited
The Plan should allocate a site KL21 (Land to the East and West of Quarry Bank Road, Keele) to support the growth of University Growth Corridor.	This comment does not relate to a main modification. The site KL21 has been considered through the site selection report, ED029, and is not selected for allocation in this Plan.	No further change	Persimmon Homes Limited
Extension of Plan period – plan period should be extended to 31 March 2041. A robust local plan review mechanism should be included.	This comment does not relate to a main modification. In line with the provisions of the December 2024 National Planning Policy Framework (paragraphs 234b & 236 respectively) for local plan making, where a local plan has been submitted for examination on or before the 12 March 2025 and the emerging Plan provides for less than 80% of local housing need, the Council will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up	No further change	Persimmon Homes Limited

	<p>and Regeneration Act 2023 in order to address any shortfall in housing need. The Council has published a local development scheme to set out a programme for producing the Local Plan. The government has recently published planning guidance (create a local plan webpages) which indicates that the Council must publish a notice of intention to commence the new local plan by 30 June 2026 and publish the outcomes of the gateway 1 self-assessment by 31 October 2026 in line with transitional arrangements.</p>		
<p>MM03–MM07: Development Strategy and Distribution. 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>The support for the Local Plan and the ongoing support for the infrastructure delivery plan in its implementation is noted.</p>	No further change	National Highways

<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>			
<p>The problems of highway and other major infrastructure in Talke and Talke Pits is well documented above and elsewhere. This modification (MM03) requires that these be addressed in any proposals. 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>	<p>The modification proposed in MM03 (Criterion 4b) relates to windfall development, which is defined in the glossary of the Local Plan as development not specifically planned for in a Local Plan but comes forward unexpectedly during the Plan period. The Talke sites, as allocations in the Local Plan are supported by evidence and have clear expectations in terms of a policy context. Any scheme would be considered in line with all the policies in the Local Plan alongside any other material considerations.</p>	<p>No further change</p>	<p>Talke Action Group (K Burgess)</p>

4. MM04 (PSD1 Overall Development Strategy, Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Paragraph 5.3 demonstrates that site AB2 is not required to meet strategic employment needs. Exceptional circumstances do not exist.	Paragraph 5.3 notes that site AB2 contributes towards meeting the economic forecast for the Borough, supports resilience, flexibility and choice and also performs a key strategic role in supporting sub-regional economic growth.	No further change	Dr J Austin
<p>Council should include a more robust buffer in the context of a reduced housing land supply</p> <p>Council should plan for a higher housing requirement.</p> <p>Given the Council is subject to transitional arrangements in the National Planning Policy Framework then a trigger mechanism should be included in policy.</p>	The Local Plan, in MM04, confirms a supply buffer of 5% above the housing requirement set out in the Local Plan. The Council, in line with the transitional requirements of the 2024 NPPF, is to start work to update the Local Plan and has set out a timetable for doing so, through an updated Local Development Scheme [EX/NBC/02].	No further change	Persimmon Homes Limited
<p>Cheshire East Council notes the proposed insertion of Table 1a 'Employment Land Supply Information'. 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</p>	<p>The approach to the allocation of the site is set out in the Council's examination employment land hearing statement, in response to Qu 9.1 / 9.3 [EX/HS/M9/01] and for the relationship with the housing requirement, the response to Qu 4.3 of the housing requirement matter statement [EX/HS/M4/01].</p> <p>The strategic employment site at Junction 16 of the M6 provides a sub-regional logistics focused employment park to accommodate employment development to meet a sub-regionally identified logistics need and provide for alternative</p>	No further change	Cheshire East Council, J Owens

<p>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>	<p>HGV parking, in line with evidenced requirements demonstrating the need for such provision. There is a need for employment land in this location, close to the M6 and strategic road network, as well as a general lack of other suitable sites to meet the overall scale of new employment land needed in the borough.</p> <p>The approach of the Council, in respect of site AB2, is consistent with the National Planning Policy Framework (December 2023), paragraphs 85 – 87 in respect of supporting economic growth, setting an economic vision and strategy, identifying a strategic site for economic growth and recognising and addressing the specific locational requirements of different sectors.</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>	<p>Table 2 (total supply from local plan housing allocations) includes the proposed allocations at Talke in the Local Plan.</p>	<p>No further change</p>	<p>Talke Action Group (K Burgess)</p>

5. MM05 (PSD3 Distribution of Development)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
The reduction of the requirement for Audley and Bignall End from 250 to 110 dwellings reflects the removal of allocations from the Plan. The modifications for Audley and Bignall End should go further and remove all proposed housing sites to reflect views of residents.	The modification has been made to reflect wider changes made to allocations in the Local Plan. It is considered that the level of development proposed for Audley is commensurate with the role and function of Audley and Bignall End, as a rural centre in the Local Plan	No further change	Will Barnish Steve Barnish (Snack in the Box) Geraldine Newman Claire Hansbury
Support for removal of -AB33 (land off Park Lane) -AB12 (land off Diglake Street) -CT1 (Land at Red Street) Due to highway and infrastructure pressure. Highways congestion and safety. Protection of rural character and environment	Noted, sites AB12, AB33 and CT1 are proposed to be removed from the Local Plan, through modifications.	No further change	Jeanette Gilmour Edward Stringer Geraldine Newman
MM03–MM07: Development Strategy and Distribution 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	The support for the Local Plan and the ongoing support for the infrastructure delivery plan in its implementation is noted.	No further change	National Highways

<p>Plans is helpful, although the plan will still need to demonstrate through evidence that no further SRN mitigation arises from these adjustments.</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>			
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6. MM06 (PSD3 Distribution of Development, Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Betley, Balterley and Wrinehill Parish Council support modification MM06 and no additional housing requirements being set out for each designated neighbourhood area.	Noted	No further change	Betley, Balterley and Wrinehill Parish Council
<p>MM03–MM07: Development Strategy and Distribution. 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>In summary, National Highways is broadly satisfied that the Main Modifications do not alter the overall development position of the</p>	The support for the Local Plan and the ongoing support for the infrastructure delivery plan in its implementation is noted.	No further change	National Highways

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			
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7. MM07 (PSD4 Development Boundaries and the Open Countryside)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support for this modification	Noted	No further change	Historic England
<p>MM03–MM07: Development Strategy and Distribution. 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>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</p>	The support for the Local Plan and the ongoing support for the infrastructure delivery plan in its implementation is noted.	No further change	National Highways

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			
MM7 (Amendment to criterion 4), renders the TK proposals in their current form, contrary to the MM7 and therefore unsound.	Noted. Defer to those comments made to Talke specific sites, namely: MM101 (TK10 Crown Bank), MM103 (TK17 Land off St Martin's Road) and MM104 (TK27 Land off Coppice Road).	No further change	Talke Action Group (K Burgess)

8. MM08 (PSD5 Green Belt)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Objection to the removal of AB2 from Green Belt designation. 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". The documentation fails to robustly demonstrate the exceptional circumstances necessary to justify the removal of 80 hectares of Green Belt land. The proposed 80-hectare site (approximately 220,000 sq. m GIA of storage and distribution) is 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.	The comment does not directly relate to modifications consulted upon. The post hearing views from the Inspector has considered and accepted that there are exceptional circumstances to release land from the Green Belt to meet employment needs in the Borough [EX/INS/06, para 15].	No further change	Ian Rowley Jill Rowley
Support for MM08 which removes site CT1 'land at Red Street' from the Plan	Noted.	No further change	Will Barnish Steve Barnish (Snack in the Box) Geraldine Newman Claire Hansbury
The amended policy wording to criteria 6 & 7 is supported as this provides flexibility and avoids placing potential unnecessary or undeliverable burdens on landowners and developers.	Noted	No further change	Richborough Estates
The proposed policy as amended is consistent with national policy, and the requirements are proportionate and achievable. SLG has previously provided	Noted	No further change	The Strategic Land Group

details of potential options for compensatory improvements in respect of site allocation TK27.			
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 related modifications at “MM08” are welcomed	Noted	No further change	Natural England
<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>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</p>	The support for the Local Plan and the ongoing support for the infrastructure delivery plan in its implementation is noted.	No further change	National Highways

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>In relation to site CT1. The site promotor has submitted viability and technical evidence to support the allocation of site CT1. The Promoter submits that:-</p> <ul style="list-style-type: none"> -the mining legacies/ground conditions at the Site can be effectively remediated to create a safe housing development; -the development of the Site in accordance with policy CT1 has been demonstrated to be viable; - the Site is deliverable and has a willing owner looking to bring the Site forward for development; -the proposed Main Modifications MM73, MM02, MM08 and PM01 are not justified and are therefore not sound; and - the CT1 allocation of the Site should be retained within the Local Plan and the changes set out in the representation forms submitted on behalf of the Promoter in respect of MM73, MM02, MM08 and PM01 should be made to the Local Plan. <p>In addition to the above submissions, the Promoter submits that the allocation of CT1 at the Site will deliver a number of benefits including :-</p>	Please see response to MM73.	No further change	Fradley BJ, Grant Anderson Hill Dickinson

<ul style="list-style-type: none"> - supporting the Government's objective of significantly boosting the supply of homes; - supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; - providing 159 affordable homes in the context of a Local Plan in which the WPVA questions the ability of many site allocations to deliver policy compliant affordable housing; - providing high quality open spaces for the health and well-being of the local community; - providing development in a sustainable location with the housing at the Site being near to a number of major areas of employment thereby enabling residents to be close to their place of work. 			
<p>Main Modification MM08 appears to be incorrect. We believe that c. AB15 Land north of Vernon Avenue is actually a typo. It should read AB33 Land off Park Road</p>	<p>This inadvertent mistake is acknowledged, and its correction is without prejudice to further instances where it has been correctly referenced including MM70 (AB15 Land north of Vernon Avenue) & MM71 (AB33 (Land off Nantwich Road / Park Lane).</p>	<p>For policy limb/criteria 2c remove the strikethrough, so as to retain AB15 Land north of Vernon Avenue), and for policy limb/criteria 2d apply strikethrough, so as to remove AB33 (Land off Nantwich Road/Park Lane).</p>	<p>J Moreau P Moreau</p>

9. MM09 (PSD6 Health and Wellbeing)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<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>	Noted	No further change	National Highways

10. MM10 (PSD7 Design)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<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>	Noted	No further change	National Highways
<p>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.</p> <p>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.</p>	Noted	<p>The Council would agree to this change if considered appropriate by the Inspector: -</p> <p>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.</p>	Staffordshire County Council (J Chadwick)

11. MM11 (CRE1 Climate Change)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Recommend that section 6.6 removes the word 'moderate' and replaces it with 'serious' to reflect the latest evidence. We recommend tighter water efficiency standards of 100lts/p/d be adopted in line with the WCS recommendations and other evidence listed above. This is justified by/aligns with evidence base and would make the plan effective.	<p>Criteria 3 has implemented the water efficiency standards of 110 litres per person per day. Concede that the evidence base (ED014 Water Cycle Study) states in para 4.7.3 the position regarding the shift from moderate to serious water stress as informed by updated Environment Agency assessment.</p> <p>Any shift in water efficiency standards will be governed by Building Regulations, Part G (as updated & informed, as appropriate, by the Environmental Improvement Plan 2025). This will be considered accordingly in the new Local Plan.</p>	If considered appropriate by the Inspector, the Council would be agreeable to an amendment to para 6.6 by replacing the term ' moderate ' with ' serious '. The Council would be agreeable to changing the water standards to 100 litres per person per day, if considered appropriate by the Inspector	Environment Agency
<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>	Noted	No further change	National Highways

Criteria 6 (H) – proposed alternative wording:- 6(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	The Council considers that the modification (MM11) as consulted upon remains the appropriate form of wording for policy limb/criteria 6(h) given the proposed removal of policy limb/criteria 6(g) and the reasonableness (as well as being fair & practicable) of expectations to place upon applicants (given varying locational characteristics) when considering their development proposals.	No further change	Staffordshire County Council (James Chadwick)
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12. MM12 (CRE2 Renewable Energy)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
MM09–MM12 – Health, Design, Climate & Renewable Energy Policies 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.	Noted	No further change	National Highways

13. MM13 (HOU1 Affordable Housing)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support for MM13 and MM14 in its proposed exemption to affordable housing of several types of housing.	Noted	No further change	The Planning Bureau on behalf of McCarthy Stone

14. MM14 (HOU1 Affordable Housing, Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support for MM13 and MM14 in its proposed exemption to affordable housing of several types of housing.	Noted	No further change	The Planning Bureau on behalf of McCarthy Stone

15. MM17 (HOU4 Gypsy, Travellers and Travelling Showpeople)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
See MM95	N/A	N/A	N/A

16. MM23 (EMP2 Existing Employment Sites)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
EMP2, criteria b and c. 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.	The Council notes that there is duplication between points b and c and would agree to the deletion of criteria c from the policy on that basis. The Council would ask that a supplementary paragraph is added to the supporting text of the policy (perhaps 8.12) to say 'To ensure the sustainability of existing employment areas, consideration should also be given as to how the loss of land or buildings would not adversely affect economic growth and employment opportunities in the local area'	If considered appropriate by the Inspector, the deletion of criteria c and introduction of a new paragraph in the supporting text (8.12) as follows: - <u>'To ensure the sustainability of existing employment areas, consideration should also be given as to how the loss of land or buildings would not adversely affect economic growth and employment opportunities in the local area'</u>	Rapleys on behalf of Allied Bakeries

17. MM26 (RET 2 Shop Fronts, Advertisements, New Signage)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support the inclusion of the modification	Noted	No further change	Historic England

18. MM27 (RET3 Restaurants, Cafes, Pubs and Hot Food Takeaways)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support the inclusion of the modification	Noted	No further change	Historic England
From a public health perspective, support the proposed change to RET3. Believe the Plan would be more effective if the 400m restriction was increased to 800m in line with stated evidence in their representation	NULBC have used 400m in line with guidance from Public Health England's 'Using the planning system to promote healthy weight environments Guidance and supplementary planning document template for local authority public health and planning teams' Para 5.11 states "The 400m distance is recognised as a reasonable walking distance, which equates approximately to a 5-minute walking time and is suitable given the length of normal school break times"	No further change	Staffordshire County Council (James Chadwick)

19. MM29 (RET5 Kidsgrove Town Centre)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support the inclusion of this modification	Noted	No further change	Historic England

20. MM30 (IN1 Infrastructure)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Should refer to local nature recovery strategy in paragraph 5 of IN1	It is considered that the reference to ecological enhancements is sufficient in the understanding and implementation of the modified policy	No further change	MM05 Staffordshire Wildlife Trust

21. MM32 (IN2 Transport and Accessibility)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
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	Noted. Defer to those comments made to Talke specific sites, namely: MM101 (TK10 Crown Bank), MM103 (TK17 Land off St Martin's Road) and MM104 (TK27 Land off Coppice Road).	No further change	Talke Action Group (K Burgess)
Suggested change to policy wording: 1) New development should make appropriate provision for access by sustainable modes of transport to protect the integrity of the highway network, <u>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</u>	Concede the stated argument that the wider context beyond the highway network should be emphasised to ensure accessibility. Also acknowledged that Criteria 8 needs to remove reference to Borough Integrated Transport Strategy as this no longer exists.	If considered appropriate by the Inspector. To insert the following text to policy limb/criteria 1: ...highway network <u>'to ensure accessibility and provide transport choice'</u> Delete from policy limb/criteria 8: reference to <u>'Borough Integrated Transport Strategy'</u>	Staffordshire County Council (James Chadwick)

<p>accessibility through sustainable modes of travel will be supported. All developments should meet, where matter relevant, the following criteria</p> <p>To amend criteria 8, as follows:</p> <p>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.</p>			
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22. MM33 (IN2 Transport and Accessibility, Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<p>MM33 para 10.15 – text has been added at the beginning to say ‘For development 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 the 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.</p> <p>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</p>	<p>Accept the stated argument that the use of the term ‘assessments’ is more appropriate.</p>	<p>If considered appropriate by the Inspector, to amend opening sentence to para 10.15 by replacing the term ‘models’ with ‘assessments’.</p>	<p>Staffordshire County Council (James Chadwick)</p>

sustainable transport networks and local facilities into new developments should be collated and presented			
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23. MM38 (IN6 Telecommunications Development)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support for the modification	Noted	No further change	Historic England

24. MM39 (IN7 Utilities)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support for the modification	Noted	No further change	Historic England
Water services are 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	<p>Noted. MM39 stemmed from recognition that this matter (water services) is managed under a separate statutory regime. Matters relating to water and sewerage infrastructure and its availability and/or network capacity are both controlled by separate, dedicated legislation i.e. s37 (water) and s94 (sewerage) of the Water Industry Act 1991.</p> <p>Defer also to those comments made to Talke specific sites, namely: MM101 (TK10 Crown Bank), MM103 (TK17 Land off St Martin's Road) and MM104 (TK27 Land off Coppice Road).</p>	No further change	Talke Action Group

<p>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>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>			
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25. MM41 (SE1 Pollution and Air Quality)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Amendments to criterion 1 are welcome. This MM is pertinent at a junction where traffic flow is controlled leading to traffic congestion. The addition of more vehicles will make this worse. 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. 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 (Talke) 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.	The amendments to criterion 1 of Policy SE1, as set out in MM41, strengthen the requirement to consider cumulative effects of emissions from proposed development alongside other and existing sources of air pollution. The Council considers this modification to be sound and appropriately addresses air quality concerns. The policy operates within the context of the broader development management framework, which includes Policy IN2 Transport and Accessibility. Development proposals are subject to environmental impact assessment and are required to demonstrate compliance with multiple policies across the plan. The suggestion to apply road-wide impact assessment and introduce conditionality regarding modification of Talke site proposals relates to wider planning decisions that were considered through the examination process and do not form part of the Main Modifications consultation.	No further change	Talke Action Group (K Burgess)

26. MM42 (SE1 Pollution and Air Quality Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
MM42 Should be clear that this relates to the significance of heritage assets,	Noted. The Council would be agreeable to the modification to include reference to	If considered appropriate to the Inspector, to insert	Historic England

including their setting. It could relate wider than to historic buildings only.	setting if considered appropriate by the Inspector.	‘and their setting’ after the reference to historic buildings in paragraph 11.4	
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27. MM45 (SE3 Flood Risk Management Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Natural England welcome the following modifications which collectively support the commitments in Policy SE5 ‘MM45’, ‘MM46’ and ‘MM47’ relating to flooding, surface water sustainable drainage and water quality	Noted	No further change	Natural England

28. MM46 (SE4 Sustainable Drainage Systems)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Canal & River Trust should be singular.	Noted. This is an additional modification that can be made to the Local Plan	An additional modification can be made to correct this in the policy.	Canal and River Trust, Hazel Smith
Natural England welcome the following modifications which collectively support the commitments in Policy SE5 ‘MM45’, ‘MM46’ and ‘MM47’ relating to flooding, surface water sustainable drainage and water quality	Noted	No further change	Natural England

29. MM47 (SE4 Sustainable Drainage Systems Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Natural England welcome the following modifications which collectively support the commitments in Policy SE5 'MM45', 'MM46' and 'MM47' relating to flooding, surface water sustainable drainage and water quality	Noted	No further change	Natural England
<p>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.</p> <p>Add to 11.16a a new point a. in the list:</p> <p>a. Collected for non-potable water.</p>	<p>The Council acknowledges the comment regarding the National Standards for Sustainable Drainage Systems. The supporting text at paragraph 11.16a sets out a range of approaches to surface water management, with the understanding that development proposals will be assessed against Policy SE4 and relevant SuDS guidance. The plan is appropriately framed to ensure alignment with evolving best practice in SuDS design without requiring exhaustive listing of every possible approach. That being said, reference to non-potable water can be added to the list (11.16a) if considered appropriate by the Inspector.</p>	<p>If considered appropriate by the Inspector, a further point can be added to 11.16a a new point a. in the list:</p> <p>a. <u>Collected for non-potable water.</u></p>	Staffordshire County Council (J Chadwick)

30. MM49 (SE5 Water Resources and Water Quality, Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Natural England welcomes 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.	Noted	No further change	Natural England

31. MM51 (SE7 Biodiversity Net Gain)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Even exempt developments are required to deliver a net gain in biodiversity as per the NPPF. This is reflected in para 11.37	This is noted. Policy SE7 (Biodiversity Net Gain) should be read alongside SE8 (Biodiversity and Geodiversity). Policy SE8 (Biodiversity and Geodiversity) supports improvements in biodiversity. The Plan is intended to be read as a whole.	No further change	MM3 Staffordshire Wildlife Trust
The phrase 'biodiversity habitat' does not really make sense - suggest rewording.	This is outside of the scope of the modifications consulted on.	No further change	MM03 Staffordshire Wildlife Trust

32. MM53 (SE8 Biodiversity and Geodiversity)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
A definition is required for the word 'significant'	The word significant is considered to appropriately reflect the intentions of the policy and provides the decision taker with an opportunity to make a judgement, on significance, when determining individual schemes	No further change	MM2 Staffordshire Wildlife Trust
Local Wildlife Sites, Sites of Biological Importance and others should be listed in paragraph 1	This is outside of the scope of the modifications consulted on. Reference to locally designated sites is covered in paragraph 4 of the policy.	No further change	MM2 Staffordshire Wildlife Trust
Paragraph 11 of the policy should mention a Local Nature Recovery Strategy / Nature Recovery Network	This is outside of the scope of modifications consulted on.	No further change	MM2 Staffordshire Wildlife Trust
Is there anything on general biodiversity improvements, native planting, swift boxes, hedgehog highways etc	This is outside of the scope of modifications consulted on.	No further change	MM2 Staffordshire Wildlife Trust
Inserting the word significant and deleting item i (trees, woodlands, hedgerows). How will you quantify what is significant? 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.	The word significant is considered to appropriately reflect the intentions of the policy and provides the decision taker with an opportunity to make a judgement, on significance, when determining individual schemes	No further change	T Barratt

33. MM54 (SE9 Historic Environment)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Historic England is 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. 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. 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	Noted	No further change	Historic England

34. MM55 (SE9 Historic Environment, Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Note the amendments made to the Plan in respect of the historic environment. 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.	Noted, it is considered that the references made in the supporting text are appropriate and consistent with the NPPF	No further change	Historic England

35. MM57 (SE11 Trees, Hedgerows and Woodland)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Would recommend replacement of at least 3 trees per tree lost or as per Bristol's tree compensation standard.	The aspiration for standards is noted but in the absence of detailed evidence base for this request, the approach set out in the Local Plan is considered to be appropriate.	No further change	Staffordshire Wildlife Trust, C Install
Amending criteria 7. "may include..." The wooliness of this language further weakens important protections. Light pollution needs to be taken much more seriously if the other environmental undertakings are to succeed.	The use of "may include" language in criteria-based policies is standard practice in planning and provides necessary flexibility to assess development proposals against site-specific circumstances. Different development sites will present different constraints and opportunities, and the criterion appropriately allows decision-makers to determine which mitigation measures are most relevant to individual proposals. Light pollution is addressed through multiple policies within the plan, including Policy SE1 (Pollution and Air Quality) and Policy SE12 (Amenity), which together establish a comprehensive framework for environmental protection. Policy SE11 criteria 7, as amended through MM57, includes explicit reference to mitigating light pollution in the context of woodland protection. The plan is intended to be read as a whole, and the amendment provides an appropriate balance between establishing clear expectations and allowing proportionate, site-specific responses.	No further change	T Barratt

Support for 'MM57' 88-89 Policy SE11	Noted	No further change	Natural England
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36. MM59 (SE12 Amenity)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<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. 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>The Council acknowledges the concern regarding deletion of criterion 3. However, the amended policy remains sound and continues to protect existing uses in accordance with the Agent of Change principle.</p> <p>The deletion reflects a more flexible approach to policy delivery rather than removal of protection. Criterion 2 requires development to demonstrate it will not place unreasonable restrictions on existing businesses, and criterion 4 provides enforcement mechanisms where mitigation proves ineffective. This combination allows officers discretionary authority to refuse unsuitable schemes on a site-specific basis.</p> <p>The Agent of Change principle is further supported by Policy EMP2, which explicitly addresses this principle for employment-related development. The plan read as a whole continues to provide comprehensive protection for existing uses and sensitive interests.</p> <p>The amended policy is therefore consistent with national policy and remains effective.</p>	No further change	<p>Tami Gomes</p> <p>Jay Taylor</p>

37. MM60 (SE13 Soil and Agricultural Land)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<p>Natural have previously advised the following with regards to plan policies relating to Soils. 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. -Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a). -Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land. -Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals). -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. -Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. 	<p>The Council acknowledges the detailed advice provided by Natural England regarding soil and agricultural land protection. The Council confirms that Policy SE13, as amended through MM60, continues to address Natural England's core requirements for the protection of best and most versatile (BMV) agricultural land and sustainable soil management. Criterion 1 of the policy requires development proposals to avoid the loss of BMV land (Grades 1, 2, and 3a), establishing the primary protective principle. Where such loss is unavoidable, criterion 3 requires demonstration of measures to mitigate harm, and criterion 4 establishes requirements for sustainable soil management. This framework is complemented by Strategic Objective SO-16, which establishes the strategic intent to "avoid, where possible, the loss of best and most versatile land and valued soils," setting the borough-wide policy direction. The amendment to Policy SE13 through MM60 streamlines the criteria to reduce duplication while maintaining the essential protection for BMV land. The remaining criteria ensure that development proposals are required to justify any unavoidable loss and implement appropriate mitigation and management measures. The policy</p>	No further change	Natural England

<p>-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).</p> <p>-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.</p> <p>-Reference should be made to Defra’s Construction Code of Practice for the Sustainable Use of Soils on Construction Sites</p> <p>-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)</p>	<p>remains consistent with national policy requirements as set out in the National Planning Policy Framework and Planning Practice Guidance and effectively protects the finite resource of BMV agricultural land in the borough.</p>		
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38. MM61 (SE14 Green and Blue Infrastructure)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Modifications to Policy SE14 are not sound as not consistent with national policy. The wording on swift bricks (NPPG Natural Environment 2025 paragraph 017) on swift bricks should be inserted into the Policy.	The Council notes the representation regarding swift bricks and the recent updates to the National Planning Policy Framework and Planning Practice Guidance (2024-2025). However, the Newcastle-under-Lyme Local Plan has been prepared in accordance with the National Planning Policy Framework published in December 2023, which did not include explicit reference to swift bricks or similar features as a requirement. The Council benefits from transitional arrangements under the National Planning Policy Framework which allow the plan to be assessed against the version of the NPPF current at the time of plan preparation. The plan was drafted and examined on the basis of the December 2023 NPPF. As such, Policy SE14 and the supporting policies on biodiversity (SE7 and SE8) provide an appropriate and sound framework within the context of the policy guidance current at the time the plan was prepared. Future development proposals will be assessed against the requirements of relevant policies in the plan, and evolution of best practice in relation to biodiversity measures (including swift bricks and similar features) can be considered through the development management process and future plan review.	No further change	Swifts Local Network: Swifts and Planning Group

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.	The Council notes the concern regarding the deletion of criterion 2d from Policy SE14. The deleted text relating to net gain in biodiversity and the Nature Recovery Network was removed to avoid unnecessary duplication. Policy SE7 (Biodiversity Net Gain) is the primary policy mechanism through which net gain requirements are controlled, setting out the mandatory requirement for development proposals to deliver at least a 10 per cent measurable net gain using the relevant statutory metric, and requiring proposals to consider opportunities to connect to or support restoration of the Local Nature Recovery Network. Policy SE8 (Biodiversity and Geodiversity) provides further protections for biodiversity interests. Policy SE14 (Green and Blue Infrastructure) establishes requirements for the incorporation of multifunctional green and blue infrastructure elements, which complement the dedicated biodiversity policies. The removal of the duplicative reference to net gain requirements in criterion 2d does not undermine the policy framework; rather, it ensures clarity by concentrating specific biodiversity net gain requirements in Policy SE7, whilst Policy SE14 focuses on the broader Green Infrastructure and Blue Infrastructure network requirements. The plan is intended to be read as a whole, and the remaining provisions of Policy SE14 continue to require development	No further change	Talke Action Group (K Burgess)
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	proposals to demonstrate net gain through the multifunctional approach to Green and Blue Infrastructure. The deletion improves the effectiveness of the policies by removing duplication and ensuring each policy has a clear, defined purpose.		
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39. MM62 (RUR1 Rural Economy)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Note the removal of the clause and reference to historic farmsteads within accompanying text to policy SE9	Noted	No further change	Historic England

40. MM63 (RUR 3 Extensions and Alterations Outside of Settlement Boundaries)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support the inclusion of the amendment	Noted	No further change	Historic England

41. MM64 (RUR4 Replacement Buildings Outside of Settlement Boundaries)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support for this modification	Noted	No further change	Historic England

42. MM65 (RUR5 Reuse of Rural Buildings)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Support for the modification	Noted	No further change	Historic England

43. MM66 (SA1 General Requirements)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Removal of SA1 (General Requirements), further weakens the policy framework for AB2 (Land at J16)	The removal of SA1 (General Requirements) seeks to remove duplication from the Local Plan. The Local Plan should be read as a whole when considering the suitability of development proposals.	No further change	Will Barnish Steve Barnish (Snack in the Box) J Reynolds Mr R & Mrs J Phillips R Nix Claire Hansby
Policy SA1 and its role for the allocated sites was discussed extensively during the hearings. Whilst the original representations only sought minor	Noted	No further change	The Strategic Land Group

detailed amendments to the policy, in light of the discussions and other amendments within the plan, support is given to its deletion			
Removal of SA1 (General Requirements) strips away essential protections relating to access, heritage, landscape, environmental constraints, and infrastructure, weakening oversight and placing the burden of risk on residents.	The Council acknowledges the concern regarding the removal of Policy SA1 (General Requirements). However, it is important to note that the deletion of SA1 does not remove the protective measures referred to. Rather, the removal seeks to eliminate duplication from the Local Plan, with the protections relating to access, heritage, landscape, environmental constraints, and infrastructure being comprehensively covered by other policies within the plan. The Local Plan should be read as a whole, and when considered in this context, the full range of protections remains in place.	No further change	P Maddock

44. MM67 (AB2 Land at J16 of the M6)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Criterion 7 – object to reference to ‘any’ adverse impacts. This should be significant or severe.	Given the location of the site and its potential impact of the strategic road network, the modification wording is considered appropriate. The modified wording is also agreed through a statement of common ground with National Highways [EX/SCG/01, para 3.15]	No further change	Indurent Strategic Land / Planning Prospects
Criterion 7 – object to the reference to Cheshire East Council needing to agree to a micro-simulation model and mitigation measures.	The existing policy wording has been agreed through a supplementary statement of common ground with Cheshire East [EX/SCG/04 pg 2&3]. It is also reflective of the location of the AB2	No further change	Indurent Strategic Land / Planning Prospects

	<p>site, on the border of Cheshire East and the Borough of Newcastle-under-Lyme. The wording, as modified seeks to confirm arrangements on a technical approach to modelling and is therefore considered to be appropriate.</p>		
<p>Criterion 13 – remove the references to Cheshire East Council.</p>	<p>The existing policy wording has been agreed through a supplementary statement of common ground with Cheshire East [EX/SCG/04 pg 2&3]. It is also reflective of the location of the AB2 site, on the border of Cheshire East and the Borough of Newcastle-under-Lyme. The policy criteria asks the travel plan to take account of advice of Cheshire East Council. This is considered appropriate given that the public transport strategy should address connectivity into Cheshire East.</p>	<p>No further change</p>	<p>Indurent Strategic Land / Planning Prospects</p>
<p>Criterion 15 as amended should 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>	<p>Noted and agreed</p>	<p>If considered appropriate by the Inspector, to suggest amending criterion 16 to read: - <u>“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”.</u></p>	<p>Indurent Strategic Land / Planning Prospects</p>
<p>Highway impacts - Concern over safety, access and traffic impacts on the strategic (M6/A500) and local highway network including on ‘b’ roads due to increased vehicular travel.</p>	<p>Several comments received do not directly address the modifications.</p> <p>The wording proposed for the modification is supported by agreed statements of common ground with the National</p>	<p>No further change</p>	<p>Andrew Darlington Jennifer Darlington Dr J Austin Will Barnish Jeanette Gilmour Ian Rowley</p>

<p>Considered there is a lack of evidence on highways matters.</p> <p>Concern over increased risks to vulnerable road users</p> <p>Microsimulation should be completed before allocation is confirmed</p> <p>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.</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. Traffic flows were taken from a traffic census back in 2022 and these are between 40% and 48% lower than today's 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>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>Highways [EX/SCG/01] and Cheshire East Council [EX/SCG/04]. The allocation is also supported by a strategic transport assessment which included a stakeholder group including Staffordshire County Council, Cheshire East Council, Stoke-on-Trent City Council and National Highways. It has appropriately considered the strategic network impacts to support the allocation of the site and sets out through policy, those elements required at the detailed planning application stage, including the preparation of a micro-simulation model.</p>		<p>Jill Rowley Edward Stringer Kimberley Cuthbert C Whitney Audley Rural Parish Council T&D Wright J Williams A Timms D& P Spode S Barnish Sustainable Exercise Partnership (Adri Hartveld) A Hough S Hough Ben Smith Cllr Casey-Hulme J Reynolds Mr R & Mrs J Phillips R Nix M Clewes A Nelson Cllr R Lewis RI Evans Geraldine Newman Melanie Harrison Claire Hansbury Protect Audley Parish Green Belt Group J Moreau P Moreau</p>
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<p>Emergency Highways Access - Concern over the location and approach to the emergency access on the site. Requests clarification and strict definition that the emergency access route (Moat Lane/Barthomley Road) is restricted exclusively to emergency vehicles and is not for general HGV or employee traffic when the A500 access is inoperative.</p> <p>How is the Moat Lane emergency use going to be policed at times of crisis?</p> <p>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, it is therefore considered that this proposal not sound</p>	<p>The representations made are not directly relevant to the main modifications consulted upon. There are no modifications proposed to criterion 2 of the policy that considers emergency access to the site. The policy in criteria 2 refers to emergency access only via Barthomley Road.</p>	<p>No further change</p>	<p>Andrew Darlington Jennifer Darlington Will Barnish Jeanette Gilmour Edward Stringer Kimberley Cuthbert T&D Wright A Timms D& P Spode A Hough S Hough Ben Smith J Reynolds Mr R & Mrs J Phillips R Nix M Clewes A Nelson RI Evans Geraldine Newman Melanie Harrison Claire Hansbury Protect Audley Parish Green Belt Group J Moreau P Moreau</p>
<p>Amenity - Impacts on the amenity and leisure activities of residents and the local community</p> <p>Impacts on pollution, light, noise, waste pollution and rights of way Criteria 3 – the reference to Park Mark Freight accreditation acknowledges potential amenity issues on the site</p> <p>Require a buffer to existing properties</p>	<p>The reference to Park Mark (modification to criterion 3 of policy AB2) is a specific matter requested by Staffordshire Police for HGV Lorry Parking sites.</p> <p>In relation to general amenity considerations, the Local Plan is intended to be read as a whole and there are policies included in the Local Plan, including policy SE1: Pollution and Air</p>	<p>No further change</p>	<p>Andrew Darlington Jennifer Darlington Ian Rowley Jill Rowley Dr J Austin Kimberley Cuthbert A Timms D& P Spode E Howell A Kelter Ben Smith</p>

<p>Overbearing visual impact on existing properties given its scale</p> <p>Noise should be mentioned in the criteria</p>	<p>Quality as an example will consider matters such as noise.</p> <p>The modified text for site AB2, requires a comprehensive masterplan approach to the site, informed by relevant assessments which will influence the layout and arrangement for the site.</p>		<p>M Clewes Geraldine Newman Melanie Harrison Claire Hansbury J Moreau P Moreau</p>
<p>Locational sustainability - no bus or train services within miles of the site. Locational sustainability challenges & general infrastructure impacts</p> <p>Criteria 13 – changes confirm that the site is not in a sustainable location, and the public transport provision is inadequate</p> <p>Scale and compatibility with the Local Plan's Spatial Strategy</p>	<p>Criterion 13 of site AB2, requires a public transport strategy to support the delivery of the site to support workers travelling to and from the site. The policy criterion, as modified, notes that it should be demonstrated that the strategy can be sustained in the longer term.</p>	No further change	<p>Andrew Darlington Jennifer Darlington Dr J Austin Audley Rural Parish Council Sustainable Exercise Partnership (Adri Hartveld) Cllr Casey-Hulme J Reynolds Mr R & Mrs J Phillips Geraldine Newman Melanie Harrison Claire Hansbury J Moreau P Moreau</p>
<p>Viability / Deliverability and Infrastructure - Full cost impact assessment should be undertaken before allocation is confirmed</p> <p>If site access is via a traffic light control at Junction 16 then this will be costly and disruptive.</p> <p>Grade separated flyover will be costly to be delivered into the site</p>	<p>The comment does not directly relate to modifications consulted upon. The site is considered to be deliverable. There are no modifications that specify that a grade separated flyover is required for the site.</p>	No further change	<p>Andrew Darlington Jennifer Darlington Will Barnish Edward Stringer Audley Rural Parish Council D& P Spode J Reynolds Mr R & Mrs J Phillips Sustainable Exercise Partnership (Adri Hartveld)</p>

Concerns over the feasibility and deliverability of infrastructure on the site.			Cllr Casey-Hulme R Nix A Nelson M Clewes Geraldine Newman Melanie Harrison Claire Hansbury Cllr D Grocott Protect Audley Parish Green Belt Group J Moreau P Moreau
<p>Landscape Impacts – Concerns regarding the visual and landscape impacts from the site, including the creation of ‘manufactured’ green corridors undermining any landscape-led proposals put forward.</p> <p>Criteria 9 – no LVIA has been completed before allocation</p> <p>Landscaping and environmental migration – 40% landscaping must be applied to deliver maximum ecological and visual benefit</p> <p>Concerns of the scale of the proposals & impact on rural character</p> <p>No reference to the height and size of warehousing. Scale and massing of the site is a concern. Concerns over the impact of landscape mounding, earthworks or structural planting given</p>	The policy for the site, as modified, requires a landscape and visual impact assessment to be prepared. The site allocation was supported by the consideration of landscape [EX/NBC/29] and the policy as modified is considered to appropriately reflect the landscape implications of the site, alongside matters including the incorporation of Green Infrastructure and a landscape and masterplan led approach to the site.	No further change	Andrew Darlington Jennifer Darlington Will Barnish Dr J Austin Jeanette Gilmour Edward Stringer Kimberley Cuthbert Audley Rural Parish Council T&D Wright A Hough S Hough A Kelter J Reynolds Mr R & Mrs J Phillips R Nix A Nelson Geraldine Newman Melanie Harrison Claire Hansbury Protect Audley Parish Green Belt Group J Moreau

<p>proximity to high pressure gas infrastructure</p> <p>The creation of 'manufactured' green corridors would undermine any landscape-led proposals put forward.</p>			P Moreau
<p>Travel Planning - 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>The modified text is agreed with Natural England, through a statement of common ground [EX/SCG03, para 11]</p>	No further change	<p>Will Barnish Kimberley Cuthbert T&D Wright A Timms Ben Smith J Reynolds Mr R & Mrs J Phillips R Nix M Clewes Geraldine Newman Melanie Harrison Claire Hansbury Protect Audley Parish Green Belt Group J Moreau P Moreau</p>
<p>Open space - 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. This undermines the principle of a landscape-led masterplan and should be revised</p>	<p>The reference in criteria 15 as amended to at least 40% of the site area as landscaping, including green corridors, and supported by the provision of a comprehensive masterplan approach should assist the delivery of the objectives for the site.</p>	No further change	<p>Will Barnish T&D Wright Ben Smith Ian Rowley Jill Rowley J Reynolds Mr R & Mrs J Phillips A Nelson M Clewes Geraldine Newman Melanie Harrison Claire Hansbury</p>

			Protect Audley Parish Green Belt Group J Moreau P Moreau
Audley Neighbourhood Plan - The proposed allocation of AB2 directly conflicts with the vision and policies of the locally ratified Audley Rural Neighbourhood Plan (ARNP)	The comment does not directly relate to modifications consulted upon. The Audley Neighbourhood Plan was ratified in October 2025. The proposed allocation is a strategic proposition and has been appropriately considered through the Local Plan to ensure local and strategic employment sites are met.	No further change	Ian Rowley Jill Rowley J Reynolds Mr R & Mrs J Phillips Cllr R Lewis
Duty-to-Co-operate - major procedural objections have been lodged by the neighbouring authority, Cheshire East Council, challenging the plan's compliance with the Duty to Cooperate.	The comment does not directly relate to modifications consulted upon. Inspector Jordan has already commented on Duty-to-Co-operate in the post hearing views to the Council [EX/INS/06, para 2].	No further change	Ian Rowley Jill Rowley E Howell J Reynolds Mr R & Mrs J Phillips Cllr R Lewis
Masterplan (Criteria 1) – introduction of a requirement of a comprehensive masterplan indicates concerns over layout and transport dependencies. Particularly a masterplan needs to consider amenity impacts such as noise (including separation distances) to existing properties / village.	The delivery of a masterplan was required previously through policy SA1 (General Requirements). Policy SA1 is proposed to be deleted, through modifications, and therefore the reference to masterplanning has been reflected in the policy requirements, not least given the scale of the site, the intention of the policy and to achieve the vision and strategic objectives of the Plan.	No further change	Dr J Austin J Moreau P Moreau
Exceptional Circumstances - no exceptional circumstances for the site due to oversupply and the presence of alternative sites in close proximity to the site	The comment does not directly relate to modifications consulted upon. The post hearing views from the Inspector has considered and accepted that there are exceptional circumstances to release land from the Green Belt in the Borough [EX/INS/06, para 15].	No further change	Jeanette Gilmour Audley Rural Parish Council E Howell Ben Smith Ian Rowley Jill Rowley J Reynolds

Concerns that exceptional circumstances for Green Belt release have not been demonstrated. Failure to recognise the harm to the purposes & objectives of the Green Belt.			R Nix A Nelson Cllr R Lewis
Agricultural Land - loss of agricultural land	The comment does not directly relate to modifications consulted upon. This matter has been considered through the site selection report [ED029] and the approach set out in the Best and Most Versatile Briefing Note [ED038]	No further change	Kimberley Cuthbert J Williams A Timms J Reynolds Mr R & Mrs J Phillips R Nix
Ecology - Impacts on biodiversity and ecology including the loss of farmland bird species that rely on open fields	The comment does not directly relate to modifications consulted upon. The Local Plan policies as read as a whole should support the delivery of the site.	No further change	Kimberley Cuthbert Audley Rural Parish Council J Williams A Hough S Hough J Reynolds Mr R & Mrs J Phillips R Nix Geraldine Newman Melanie Harrison Claire Hansbury Protect Audley Parish Green Belt Group
Flood risk and drainage concerns - including parts of the AB2 site, particularly near Moat Lane, are affected by persistent flooding linked to an ancient moat and underlying drainage issues. Proposed earth mounding would further displace water onto surrounding roads and neighbouring land, increasing both the frequency and severity of flooding events.	The comment does not directly relate to modifications consulted upon. Criterion 16 of the site policy for site AB2 provides for an integrated surface water drainage strategy for the site.	No further change	Kimberley Cuthbert Audley Rural Parish Council A Timms E Howell A Kelter J Reynolds Mr R & Mrs J Phillips R Nix

Require site-specific flood risk assessment and drainage (including SuDs) alongside impacts on existing drainage mechanisms (such as septic tanks)			
Ground stability - a comprehensive investigation into ground stability and mining-related risks must be undertaken	The comment does not directly relate to modifications consulted upon. The Local Plan, when read as a whole, considers appropriate policies on ground stability (SE2 Land Contamination).	No further change	Kimberley Cuthbert J Reynolds Mr R & Mrs J Phillips R Nix
Health impacts need to be fully assessed	The comment does not directly relate to modifications consulted upon. The Local Plan, when read as a whole, considers appropriate policies on health and wellbeing (PSD6: Health and Wellbeing)	No further change	Claire Hansbury
Employment land need - There is an overreliance on challengeable evidence relating to employment land need There are existing employment sites available, including those on brownfield, in established locations and in the wider sub-region	The comment does not directly relate to modifications consulted upon. The employment land clarification note set s out the approach to the supply of employment land in the borough [ED032]	No further change	Audley Rural Parish Council Sustainable Exercise Partnership (Adri Hartveld) A Hough S Hough E Howell Cllr Casey-Hulme J Reynolds Mr R & Mrs J Phillips R Nix Cllr R Lewis Protect Audley Parish Green Belt Group
Heritage Impact - Cumulative impacts of development on heritage	The comment does not directly relate to modifications consulted upon. Criteria 11 requires the submission of a heritage impact assessment for the site.	No further change	Audley Rural Parish Council J Reynolds Mr R & Mrs J Phillips R Nix
Betley, Balterley and Wrinehill Parish Council support the travel plan	Noted	No further change	Betley, Balterley and Wrinehill Parish Council

requirements and the discouragement of routing of traffic past the Black Firs and Cranberry Moss SSSI on the A531.			
<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>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. 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. Natural England welcome 'MM67' criteria 13.</p>	Noted	No further change	Natural England
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	<p>The reference to the Black Firs and Cranberry Bog is an agreed position with Natural England [EX/SGG/03. Para 3.11]. No further change required.</p> <p>The proposed changes to criterion 13 would be acceptable to the Council.</p>	<p>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 <u>service provision</u> 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</p>	Staffordshire County Council (J Chadwick)

<p>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</p>		<p>Council, <u>including having regard to the Employment and Skills Plan.</u></p>	
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<p>demand response schemes is not necessary.</p> <p>1. Remove the following text from Criteria 13:</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>And replace with the following:</p> <p><u>Implementation of an agreed strategy to</u> 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 <u>service provision that it</u> 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, <u>including having regard to the Employment and Skills Plan.</u></p>			
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45. MM68 (AB2 Land at J16 of the M6 Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
The supporting text should be strengthened to provide greater detail on highways evidence, deliverability, mitigation requirements, emergency access arrangements, traffic management measures to protect sensitive ecological sites, and landscape and visual impact assessment requirements.	The comment does not directly relate to modifications consulted upon. The context provided by the supporting information to policy AB2 is considered appropriately framed, when read alongside other policies in the Local Plan.	No further change	Will Barnish Steve Barnish (Snack in the Box) Edward Stringer J Reynolds Mr R & Mrs J Phillips R Nix A Nelson
No exceptional circumstances for the site due to oversupply and the presence of alternative sites in close proximity to the site	The comment does not directly relate to modifications consulted upon. The post hearing views from the Inspector has considered and accepted that there are exceptional circumstances to release land for employment uses from the Green Belt in the Borough [EX/INS/06, para 15].	No further change	Jeanette Gilmour J Reynolds Mr R & Mrs J Phillips R Nix A Nelson Cllr R Lewis
Highways evidence and access. Outdated / insufficient data. Not able to obtain highway access directly from the A500 due to congestion. Congestion issues due to HGVs accessing and egressing the site	The comment does not directly relate to modifications consulted upon. The policy context for site AB2 appropriately addresses the allocation of the site and guides its delivery.	No further change	Jeanette Gilmour Edward Stringer J Reynolds Mr R & Mrs J Phillips R Nix A Nelson Cllr R Lewis
Barthomley Road Access – emergency access is unacceptable without strict controls (emergency vehicles only)	The representations made are not directly relevant to the main modifications consulted upon. There are no modifications proposed to criterion 2 of the policy that considers emergency access to the site. The policy in criteria 2 refers to emergency access only via Barthomley Road.	No further change	Jeanette Gilmour Edward Stringer J Reynolds
Modifications (MM67 and) MM68 amend the policy and supporting text; however, they do not resolve the substantial issues and	Site AB2 is an available, suitable and deliverable site allocation	No further change	Claire Hansbury

concerns previously identified by the Inspector during examination.			
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46. MM69 (AB12, land at Diglake Street)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
The modification and removal of site AB12 is welcome as it would impose unsustainable pressure on infrastructure, highways and Green Belt.	Site AB12 is proposed to be removed from the Local Plan, via modification.	No further change	Will Barnish T&D Wright Steve Barnish (Snack in the Box) Geraldine Newman Claire Hansby Protect Audley Parish Green Belt Group J Moreau P Moreau
Object to the removal of the site and believe its exclusion is not a matter of Soundness	The response is noted. The site was included in the Local Plan as a proposed allocation and therefore the Council had come to a view about the suitability and deliverability of the site through its proposed allocation in the submitted Plan. The Council also notes the Inspector's views on the site in the post examination hearings advice note [EX/INS/06 , para 25] As noted by the Council in examination documents EX/NBC/50 & EX/NBC/56, the Council remains committed to the earliest possible adoption of the new Local Plan, securing the ability to deliver new housing, employment land and infrastructure in the Borough.	No further change	Staffordshire County Council
Removal of the Green Belt allocations from Audley and Bignall End means the Parish cannot meet its local housing need as stated in the made neighbourhood plan	The Council notes the Inspector's views on the site in the post examination hearing, advice note [EX/INS/06]	No further change	Staffordshire County Council

(including consequent changes to PSD3 Distribution of Development)			
The allocation of AB12 provided for a sensible rounding off of the green belt boundary, tying in with the built form from Diglake St to Hope St.	The Council notes the Inspector's views on the site in the post examination hearing, advice note [EX/INS/06]	No further change	Staffordshire County Council
<p>The rationale that concerns over highway matters are reason enough to remove the site as an allocation is challenged.</p> <p>The proposal was supported by high level transport evidence demonstrating that a suitable form of access could be taken to the site including the merits of formation of a one-way system of Diglake St & Albert St. 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</p>	The Council notes the Inspector's views on the site in the post examination hearing, advice note [EX/INS/06]	No further change	Staffordshire County Council
Open to a policy addition/modification to stipulate that provision of older persons accommodation should be considered ahead of market/family dwellings to diminish highway impacts and satisfy a desire from the community for accommodation of this type.	The Council notes the Inspector's views on the site in the post examination hearing, advice note [EX/INS/06]	No further change	Staffordshire County Council
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	The deleted text relate to sites proposed to be removed from the Plan.	No further change	Historic England

rationale for when considerations are included and when they have been deleted			
Supports the removal of allocated housing sites (AB12, AB33, and CT1) due to anticipated pressure on local highways and infrastructure.	Site AB12 is proposed to be removed from the Local Plan, via modification.	No further change	Ben Smith

47. MM70 (AB15 Land North of Vernon Avenue)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
A planning appeal has been successful for 39 homes in the Green Belt. As such AB15 is not necessary (APP/P3420/W/25/3363903, land at New Farm, Cross Lane, ST7 8JQ)	The comment does not relate to a main modification. The allocation at AB15 is suitable, available and deliverable allocation in the Local Plan.	No further change	Dr J Austin J Williams C Stratton M Clewes R Nix P Maddock J Moreau P Moreau
Object to the building on this site due to highways, flooding.	Any future planning application(s) will be determined in accordance with the relevant policy criteria applicable to the site, other relevant policies in the Local Plan and any other material considerations	No further change	J Williams
Object to the removal of policy SA1 general requirements from the policy - leaves the site at risk of poor regulation and limits residents protection	The removal of SA1 (General Requirements) seeks to remove duplication from the Local Plan. The Local Plan should be read as a whole when considering the suitability of development proposals.	No further change	J Williams C Stratton M Clewes P Maddock J Moreau P Moreau
Object to the landscape modifications as seem vague and unenforceable 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	Any future planning application(s) will be determined in accordance with the relevant policy criteria applicable to the site, other relevant policies in the Local Plan and any other material considerations, with further detail being provided at planning application stage.	No further change	C Stratton M Clewes P Maddock J Moreau P Moreau

<p>Audley was a mining area, site requires a full investigation of ground risks.</p> <p>The basic land contamination 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>	<p>A land contamination assessment and mitigation strategy is required to support any future planning application. Any future planning application(s) will be determined in accordance with the relevant policy criteria applicable to the site, other relevant policies in the Local Plan and any other material considerations</p>	<p>No further change</p>	<p>C Stratton M Clewes P Maddock J Moreau P Moreau</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>Any future planning application(s) will be determined in accordance with the relevant policy criteria applicable to the site, other relevant policies in the Local Plan and any other material considerations, with further detail being provided at planning application stage.</p>	<p>No further change</p>	<p>M Clewes P Maddock</p>

48. MM71 (AB33 Land off Nantwich Road)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
The modification and removal of site AB33 is welcome as it would impose unsustainable pressure on infrastructure, highways and the Green Belt.	Site AB33 is proposed to be removed from the Local Plan, via modification.	No further change	Will Barnish T&D Wright Protect Audley Parish Green Belt Group J Moreau P Moreau
Object to the removal of the site and believe its exclusion is not a matter of Soundness	The response is noted. The site was included in the Local Plan as a proposed allocation and therefore the Council had come to a view about the suitability and deliverability of the site through its proposed allocation in the submitted Plan. The Council also notes the Inspector's views on the site in the post examination hearings advice note [EX/INS/06 , para 26] As noted by the Council in examination documents EX/NBC/50 & EX/NBC/56, the Council remains committed to the earliest possible adoption of the new Local Plan, securing the ability to deliver new housing, employment land and infrastructure in the Borough.	No further change	Staffordshire County Council
Removal of the Green Belt allocations from Audley and Bignall End means the Parish cannot meet its local housing need as stated in the made neighbourhood plan	Site AB33 is proposed to be removed from the Local Plan, via modification.	No further change	Staffordshire County Council
Contended that 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	The Council notes the Inspector's views on the site in the post examination hearings, that the SFRA2 identifies surface water flooding constraints taking into account the effects of climate change and	No further change	Staffordshire County Council

surface water management & SuDS in place. All of which can be addressed at the development management stage.	the disposition and depth of flood water in a 3.3% and 1% AEP 2070s.		
Combining AB33 and AB32 would provide for a better scheme overall, including setting a defensible green belt boundary with Alsager Road to the north.	The Council notes the Inspector's views on the site in the post examination hearings, that the SFRA2 identifies surface water flooding constraints and would lead to more than moderate harm to the Green Belt and is therefore proposed to be removed from the Local Plan, via modification.	No further change	Staffordshire County Council
Supports the removal of allocated housing sites (AB12, AB33, and CT1) due to anticipated pressure on local highways and infrastructure.	Site AB33 is proposed to be removed from the Local Plan, via modification.	No further change	Ben Smith

49. MM73 (CT1 Land at Red Street)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Talke is a small village and does not have sufficient infrastructure	Site CT1 (Land at Red Street) is proposed, through modification, to be deleted from the Local Plan	No further change	W Fairey
CT1 (Land at Red Street) will have an impact on Talke Village.	Site CT1 (Land at Red Street) is proposed, through modification, to be deleted from the Local Plan	No further change	W Fairey
Impacts on the character of Talke Village of development	Site CT1 (Land at Red Street) is proposed, through modification, to be deleted from the Local Plan	No further change	W Fairey

Traffic congestion impacts (including pollution) of development at Talke	Site CT1 (Land at Red Street) is proposed, through modification, to be deleted from the Local Plan	No further change	W Fairey
The modification and removal of site CT1 is welcome as it would impose unsustainable pressure on infrastructure, highways and Green Belt.	Site CT1 (Land at Red Street) is proposed, through modification, to be deleted from the Local Plan	No further change	Will Barnish T&D Wright Protect Audley Parish Green Belt Group J Moreau P Moreau
Supports the removal of allocated housing sites (AB12, AB33, and CT1) due to anticipated pressure on local highways and infrastructure.	Site CT1 (Land at Red Street) is proposed, through modification, to be deleted from the Local Plan	No further change	Ben Smith
<p>In relation to site CT1. The site promotor has submitted viability and technical evidence to support the allocation of site CT1. The Promoter submits that:-</p> <ul style="list-style-type: none"> -the mining legacies/ground conditions at the Site can be effectively remediated to create a safe housing development; -the development of the Site in accordance with policy CT1 has been demonstrated to be viable; - the Site is deliverable and has a willing owner looking to bring the Site forward for development; -the proposed Main Modifications MM73, MM02, MM08 and PM01 are not justified and are therefore not sound; and - the CT1 allocation of the Site should be retained within the Local Plan and the changes set out in the representation forms submitted on behalf of the Promoter in 	<p>The response is noted. The site was included in the Local Plan as a proposed allocation and therefore the Council had come to a view about the suitability and deliverability of the site through its proposed allocation in the submitted Plan. The Council also notes the Inspector's views on the site in the post examination correspondence [EX/INS/07] As noted by the Council in examination documents EX/NBC/50 & EX/NBC/56, the Council remains committed to the earliest possible adoption of the new Local Plan, securing the ability to deliver new housing, employment land and infrastructure in the Borough.</p>	No further change	Fradley BJ, Grant Anderson Hill Dickinson

<p>respect of MM73, MM02, MM08 and PM01 should be made to the Local Plan.</p> <p>In addition to the above submissions, the Promoter submits that the allocation of CT1 at the Site will deliver a number of benefits including :-</p> <ul style="list-style-type: none"> - supporting the Government's objective of significantly boosting the supply of homes; - supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; - providing 159 affordable homes in the context of a Local Plan in which the WPVA questions the ability of many site allocations to deliver policy compliant affordable housing; - providing high quality open spaces for the health and well-being of the local community; - providing development in a sustainable location with the housing at the Site being near to a number of major areas of employment thereby enabling residents to be close to their place of work. 			
<p>A similar assessment of the Talke sites should be undertaken as that for site CT1. Flooding, remediation costs, greenfield sites equally apply to the Talke sites as CT1, which is now proposed to be delivered.</p>	<p>Site CT1 (Land at Red Street) is proposed, through modification, to be deleted from the Local Plan</p>	<p>No further change</p>	<p>Talke Action Group (K Burgess)</p>

50. MM77 (KL13 Keele Science Park)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<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</p> <p>This includes: -</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p>	Noted	No further change	Natural England

51. MM78 (KL15 Land South of A525)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
KL15 should only be developed when all alternatives are exhausted, optimising KL13 and the existing university site.	The representation does not relate to a modification consulted upon. The Council and Keele University has responded on this point in examination document EX/NBC/47 & EX/NBC/47a	No further change	Tom Jervis
KL15 - A wildlife 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.	The representation does not relate to a modification consulted upon. Criterion 10 of the policy refers to the need for appropriate ecological buffers being maintained.	No further change	Tom Jervis

<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</p> <p>This would apply to sites</p> <p>KL13 & KL15 – Land South of A525 between Keele University and Newcastle</p>	<p>Noted</p>	<p>No further change</p>	<p>Natural England</p>
<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. The Policy wording relating to developer contributions in MM78 states ‘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.’ From this it is unclear</p>	<p>Noted, the static policies map can be amended to reflect the inclusion of the stretch of the existing KL13 road.</p> <p>The policy wording in criterion 5 is considered to appropriately framed and is an agreed position through a statement of common ground [EX/SCG11 and EX/SCG/12].</p>	<p>To amend the policies map to show the full stretch of the safeguarded route, from the A525 to the A53.</p>	<p>Staffordshire County Council (J Chadwick)</p>

<p>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>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>			
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52. MM81 (KS3 Land at Blackbank Road)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Object to the deletion of KS3 Blackbank Road from the Plan. The site is part of a wider approach set out in the Knutton Town Deal Masterplan and Newcastle-under-Lyme Town Investment Plan and its removal undermines recent investment in community facilities, enterprise units and regeneration in the area. The site also provides for homes in that location.	The response is noted. The site was included in the Local Plan as a proposed allocation and therefore the Council had come to a view about the suitability and deliverability of the site through its proposed allocation in the submitted Plan. The Council also notes the Inspector's views on the site in the post examination hearings advice note [EX/INS/06 , para 35] As noted by the Council in examination documents EX/NBC/50 & EX/NBC/56, the Council remains committed to the earliest possible adoption of the new Local Plan, securing the ability to deliver new housing, employment land and infrastructure in the Borough.	No further change	Aspire Homes
Sport England are supportive of the removal of allocation KS3, Land at Blackbank Road due to it not being demonstrated that NPPF paragraph 104 has been achieved in terms of the potential loss of a sports pitch.	The response is noted.	No further change	Sport England

53. MM86 (LW53 Land at Corner of Mucklestone Wood Lane)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
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.	Noted	No further change	Natural England

54. MM87 (MD29 Land North of Bar Hill)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
'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. 8. A tree survey should be prepared to identify trees subject to Tree Preservation Orders, as appropriate	Noted	No further change	Natural England

55. MM90 (SP11 Lyme Park)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Compensatory Improvements have not been provided for the site	The representation does not directly relate to a modification consulted upon. The Local Plan is intended to be read as a whole and policy PSD5 (Green Belt) makes appropriate reference to compensatory improvements that would be applicable to the site.	No further change	Tom Jervis
The proposed development will ruin the beautiful views across the site	The representation does not directly relate to a modification consulted upon. The site in criterion 7 provides for a design code and masterplan to support the overall delivery of the site.	No further change	Tom Jervis
There is no plan to replace SP11 with an alternative open space accessible to the public.	The representation does not directly relate to a modification consulted upon. The site provides for a country park setting which will be accessible to the public and future residents of the site	No further change	Tom Jervis
A larger reduction in the site (SP11 1&2) should take place to retain open land across the site	The representation does not directly relate to a modification consulted upon. The size of the site has been considered through the allocation of the site and is proposed to be suitably framed.	No further change	Tom Jervis
The area of land for the land parcels, including site 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 to encroach on the Green Belt of the County Park.	The representation does not directly relate to a modification consulted upon. MM 120 (the housing trajectory) can be amended to insert the individual site parcel sites as follows:- SP11(1) = 8.6Ha SP11(2) = 9.3 Ha SP11(3) = 7.1 Ha SP11(4) = 3.4 Ha	If considered appropriate by the Inspector, there is potential to amend the housing trajectory (MM120) to insert the site sizes in the trajectory.	Silverdale Parish Council

<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. Create links to the environmental sensitive areas within the Cowfield through the Countryside Park. Several strands of buffer zone could be incorporated to create an environmentally sustainable Green Belt</p>	<p>The representation does not directly relate to a modification consulted upon The 'Cow Field' is appropriately considered as protected open space under the proposals.</p>	<p>No further change</p>	<p>Silverdale Parish Council</p>
<p>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.</p>	<p>The intention is for the wildlife corridor within SP11(3) to be retained in the site. The boundaries for the site (SP11(3) are appropriately framed to support their delivery and to demarcate changes to the Green Belt boundary within the wider site.</p>	<p>No further change</p>	<p>Cllr J Brown</p>
<p>It is considered that the plan is biased with elements of 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. In the case of the Bignall End site (AB12 & adjoining AB75) 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</p>	<p>The representation does not directly relate to a proposed modification.</p>	<p>No further change</p>	<p>M Coupe/Gez Willard</p>

development site. it leaves a significant element of doubt as to the Council's impartiality and (Council) bias in preparing its land use plan. This is relevant to the allocations of Lyme Park (SP11) with 4 significant housing sites within it. The 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			
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. 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.	The representation does not directly relate to a modification consulted upon. The allocation of the site is supported by the site selection report [ED029] and associated evidence prepared to support the Local Plan , including the Council's response to the Inspector's post hearing letter [EX/NBC/52]	No further change	M Coupe/Gez Willard
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 - they are isolated pockets of hard development in the Green Belt which run counter to the principle of keeping land permanently open. The allocations are sprawling and constitute encroachment into the Countryside. They would by virtue of their siting, extent and	The representation does not directly relate to a modification being consulted upon. The allocation of the site is supported by the site selection report [ED029] and associated evidence prepared to support the Local Plan, including the Council's response to the Inspector's post hearing letter [EX/NBC/52]	No further change	M Coupe/Gez Willard

configuration harm the long-term protection of the Green Belt in this area.			
Lack of evidential need for a 2 nd Country Park - the plan and its previous incarnations, which did not provide for 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	The representation does not directly relate to a modification consulted upon. The allocation of the site is supported by the site selection report [ED029} and associated evidence prepared to support the Local Plan, including the Council's response to the Inspector's post hearing letter [EX/NBC/52]		M Coupe/Gez Willard
<p>Changes to make the Plan Sound:</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</p>	The representation does not directly relate to a modification consulted upon. The allocation of the site is supported by the site selection report [ED029} and associated evidence prepared to support the Local Plan, including the Council's response to the Inspector's post hearing letter [EX/NBC/52]		M Coupe/Gez Willard

prevent the Borough Council defaulting on its intention as Council budgets are likely to remain strained.			
Natural England welcomes: - 'MM57' 88-89 Policy SE11 As it would apply to SP11 – Former Keele Municipal Golf Course	Noted	No further change	Natural England
<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>	The reference in criteria 16 is considered appropriate as it refers to contributions towards highway improvements, this would include reference to a safeguarded route, as noted in other policies.	No further change	Staffordshire County Council (J Chadwick)

56. MM91(SP11 Lyme Park, Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
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	The representation does not directly relate to a modification consulted upon. Paragraph 13.177 supports high quality active travel corridors between the site parcels.	No further change	Silverdale Parish Council

57. MM93 (SP23 Land at Cemetery Road)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Raised/maintained concern (see Statement of Common Ground, EX/SCG/08) regarding the allocation of sites in proximity of Walleys Quarry. 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 proposed restrictions do not adequately mitigate the risks. A further local plan review mechanism could re-assess the site as part of a 5 year review.	In line with the Inspector's Post Hearing views, the site has been pushed back in respect of the housing trajectory until no earlier than 2030/31 [EX/INS/06, para 34]	No further change	Environment Agency

58. MM95 (G&T 8 Land West of Silverdale Business Park)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<p>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.</p> <p>2 Whilst the trajectories for housing provision seem somewhat unrealistic (P188 App 6) – ie the legal compliance or soundness 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.</p> <p>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.</p> <p>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</p>	<p>The allocation Site G&T8 Land West of Silverdale Business Park has been removed following discussions at the local plan hearings. The policy approach in HOU4 Gypsy, Travellers and Travelling Showpeople would apply to site proposals for such uses as they would come forward.</p>	<p>No further change</p>	<p>A Drakakis-Smith, Thistleberry Residents Associations</p>

Act of 2010, Crime and Policy Bill 2025.			
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59. MM97 (BL18 Land at Clough Hall)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
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. Natural England note the following modifications and request formal consultation on the assessments detailed in MM97 (site specific flood risk assessment / drainage strategy / masterplan)	Noted, consultation would take place with Natural England in respect of assessments undertaken as part of any future planning application	No further change	Natural England

60. MM101 (TK10 Crown Bank)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Talke is a small village and does not have sufficient infrastructure	The issue does not relate to a proposed main modification. The approach to the settlement hierarchy and spatial distribution is set out in the Council's Matter 2 Hearing Statement [EX/HS/M2/01]	No further change	W Fairey
Impacts on the character of Talke Village of development	The issue does not relate to a proposed main modification. The approach to the settlement hierarchy and spatial distribution is set out in the Council's Matter 2 Hearing Statement [EX/HS/M2/01]	No further change	W Fairey
Traffic congestion impacts (including pollution) of development at Talke	The issue does not relate to a proposed main modification. The Council has	No further change	W Fairey

	prepared a strategic transport assessment [ED011] and considered such matters through the site selection process		
Impacts of the site on the Conservation Area boundary of Talke and listed buildings	The issue does not relate to a proposed main modification. A Heritage Impact Assessment has considered the impacts of the site on heritage assets [ED015] which has led to an appropriate policy context for the site	No further change	W Fairey
The site makes a strong contribution to Green Belt purposes	The issue does not relate to a proposed main modification. Green Belt matters have been considered through the Council's Green Belt Assessment [ED008] and site selection report [ED029]	No further change	W Fairey
Change in views from public rights of way	The issue does not relate to a proposed main modification. Landscape impacts have been considered through the Landscape Character Study [ED017] and supporting site selection report [ED029] and sustainability appraisal [CD03]	No further change	W Fairey
Reduced figures for the TK sites, whether removal of one or more of the sites should be undertaken. Similar changes require as set out to modification, MM104. 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	The Council acknowledges the respondent's concern regarding highway capacity in Talke. Whilst this comment relates primarily to TK27 and MM104, the Council notes that the modification to criterion 8 of Policy TK27 appropriately requires an assessment of the need for off-site highway improvements including at the Coppice Road / Merelake Road / Coal Pit Lane Junction and offsite footway improvements. The broader capacity of the main road network through Talke	No further change	Talke Action Group (K Burgess)

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	(including Swan Bank, Crown Bank, High Street, and Pit Lane) has been assessed through the Strategic Transport Assessment [ED011], which informed the overall development strategy and spatial distribution of sites. The site-specific assessment required by the policy will identify mitigation measures necessary to support the development. The Highway Authority (Staffordshire County Council) has confirmed that the amended approach to criterion 8 is appropriate and acceptable.		
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61. MM103 (TK17 Land off St Martins Road)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Talke is a small village and does not have sufficient infrastructure	The issue does not relate to a proposed main modification. The approach to the settlement hierarchy and spatial distribution is set out in the Council's Matter 2 Hearing Statement [EX/HS/M2/01]. Existing policy wording proposes financial contributions to improvements to local schools and health facilities.	No further change	W Fairey
Impacts on the character of Talke Village of development	The issue does not relate to a proposed main modification. The approach to the settlement hierarchy and spatial distribution is set out in the Council's Matter 2 Hearing Statement [EX/HS/M2/01]	No further change	W Fairey
Traffic congestion impacts (including pollution) of development at Talke	The issue does not relate to a proposed main modification. The Council has prepared a strategic transport assessment [ED011] and considered	No further change	W Fairey

	such matters through the site selection process		
Impacts on Green Belt	The issue does not relate to a proposed main modification. Green Belt matters have been considered through the Council's Green Belt Assessment [ED008] and site selection report [ED029]	No further change	W Fairey

62. MM104 (TK27 Land off Coppice Road)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
Talke is a small village and does not have sufficient infrastructure	The issue does not relate to a proposed main modification. The approach to the settlement hierarchy and spatial distribution is set out in the Council's Matter 2 Hearing Statement [EX/HS/M2/01]	No further change	W Fairey
Impacts on the character of Talke Village of development	The issue does not relate to a proposed main modification. The approach to the settlement hierarchy and spatial distribution is set out in the Council's Matter 2 Hearing Statement [EX/HS/M2/01]	No further change	W Fairey
Traffic congestion impacts (including pollution) of development at Talke	The modification, to policy criterion 8, requires an assessment of the need for off-site highway and footway improvements which is considered appropriate. Criterion 10 of the policy requires contributions to improvements to Talke Signals, identified as mitigation through the Strategic Transport Assessment [ED011]	No further change	W Fairey
Loss of Green Belt	The issue does not relate to a proposed main modification. Green Belt matters have been considered through the	No further change	W Fairey

	Council's Green Belt Assessment [ED008] and site selection report [ED029]		
The deletion of criterion 1 of Policy TK27 is necessary following the deletion of Policy SA1.	Noted	No further change	The Strategic Land Group
SLG sought amendments to part 8 of the policy, relating to highways works at the Coppice Road / Merelake Road / Coal Pit Lane Junction - the proposed revision to part 8 addresses the issues of soundness identified, and support is given to the revision to this part of the policy.	Noted	No further change	The Strategic Land Group
For clarity, the objections to the detailed wording of criteria 9 & 10 remain (as per those amendments sought in the Matter 7 Hearing Statement).	Noted	No further change	The Strategic Land Group
<p>Reduced figures for the TK sites, whether removal of one or more of the sites should be undertaken.</p> <p>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>	Any planning application would be considered in line with all the policies in the Local Plan such as the highway assessments and any other material considerations such as infrastructure.	No further change	Talke Action Group (K Burgess)

<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> <p>Replace the proposed change to Criteria 8 with the below:</p>	<p>Noted</p>	<p>If considered to be appropriate by the Inspector, the Council would accept the modification to the policy as suggested by Staffordshire County Council:-</p> <p>Replace the proposed change to Criteria 8 with the below:</p> <p><u>“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”.</u></p>	<p>Staffordshire County Council (J Chadwick)</p>
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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.			
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63. MM106 (TB19 Land South of Newcastle Golf Club)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
No objection to the modifications to criteria 6	Noted	No further change	Richborough Estates
For Criteria 9, 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	Noted	If considered appropriate by the Inspector, the Council would agree to a form of words to be added to criteria 9, to note that <u>the statutory undertaker will require access to the pylons across the site for maintenance.</u>	Richborough Estates
The amendment to criteria 11 relating to the safeguarding of the future transport link is supported. 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.	The support for the future transport link is noted. There is an agreed position on the delivery of the safeguarded route and as such it is not necessary to include this within the supporting information to the policy.	No further change	Richborough Estates
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	This comment does not directly relate to modifications being consulted upon. Criteria 10 could be deleted if considered necessary by the Inspector.	No further change	Richborough Estates
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	Noted and agreed.	To insert policy wording, as follows:- <u>“Provision of a new and / or enhanced bus service from Newcastle-under-Lyme to the site, including bus stops and associated infrastructure”.</u>	Staffordshire County Council

<p>in its suggested raft of changes and as such the Policy is not acceptable in transport terms. An additional criterion 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</p> <p>Policy TB19 to be amended by the addition of the following criterion to the 13 already listed:</p> <ul style="list-style-type: none"> - Provision of a new and / or enhanced bus service from Newcastle-under-Lyme to the site, including bus stops and associated infrastructure. 			
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64. MM107 (TB19 Land South of Newcastle Golf Club, Supporting Text)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<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>	Noted and agreed.	<p>If considered to be appropriate by the Inspector. To insert new text at the end of paragraph 13.240, as follows:-</p> <p><u>‘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.’</u></p>	Staffordshire County Council

65. MM108 (TB23, Galingale View)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<p>Raised/maintained concern (see Statement of Common Ground, EX/SCG/08) regarding the allocation of sites in proximity of Walleys Quarry. 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 proposed restrictions do not adequately mitigate the risks. A further local plan review mechanism could re-assess the site as part of a 5 year review.</p>	<p>In line with the Inspector’s Post Hearing views, the site has been pushed back in respect of the housing trajectory until no earlier than 2030/31 [EX/INS/06, para 34</p>	No further change	Environment Agency

Support for the allocation of TB23 as a suitable and deliverable site (Land West of Galingale View)	Noted	No further change	Persimmon Homes
Site promotor supports the Main Modifications to site TB23 (Land West of Galingale View)	Noted	No further change	Persimmon Homes

66. MM121 (New Appendix 8, Advice Note)

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
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	It is considered that individual site allocations make appropriate reference to matters of the historic environment when the Local Plan is read as a whole, alongside SE9 Historic Environment	No further change	Historic England
Whilst support is given to the clarification in the policy that the need for a masterplan requirements particularly relate to applications made in outline; we consider that an additional sentence should be added to clarify that a planning application	The Council considers that the wording, as set out Appendix 8 is appropriately framed. The introduction to Appendix 8 makes clear that the list is intended to be a prompt for key matters for consideration.	No further change	The Strategic Land Group

is a potential route for the approval of a masterplan. 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.			
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67. Sustainability Appraisal

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<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. 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</p>	Noted	No further change	National Highways

Sustainability Appraisal remains consistent with the most up to date transport evidence.			
MM17 and other deletions of site policies 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 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.	Noted	No further change	National Highways

68. Policies Map

Summary of Main Issues Raised	Council Response	Potential Change to the Plan	Respondents Name
<p>PM01 - In relation to site CT1. The site promotor has submitted viability and technical evidence to support the allocation of site CT1. The Promoter submits that:-</p> <ul style="list-style-type: none"> -the mining legacies/ground conditions at the Site can be effectively remediated to create a safe housing development; -the development of the Site in accordance with policy CT1 has been demonstrated to be viable; - the Site is deliverable and has a willing owner looking to bring the Site forward for development; -the proposed Main Modifications MM73, MM02, MM08 and PM01 are not justified and are therefore not sound; and - the CT1 allocation of the Site should be retained within the Local Plan and the changes set out in the representation forms submitted on behalf of the Promoter in respect of MM73, MM02, MM08 and PM01 should be made to the Local Plan. <p>In addition to the above submissions, the Promoter submits that the allocation of CT1 at the Site will deliver a number of benefits including :-</p> <ul style="list-style-type: none"> - supporting the Government's objective of significantly boosting the supply of homes; - supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be 	See response to MM73.	No further change	Fradley BJ, Grant Anderson Hill Dickinson

<p>provided to meet the needs of present and future generations;</p> <ul style="list-style-type: none"> - providing 159 affordable homes in the context of a Local Plan in which the WPVA questions the ability of many site allocations to deliver policy compliant affordable housing; - providing high quality open spaces for the health and well-being of the local community; - providing development in a sustainable location with the housing at the Site being near to a number of major areas of employment thereby enabling residents to be close to their place of work. 			
PM03 - 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.	Noted	No further change	Richborough Estates
PM03 - 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.	Noted, this change could be made, if requested by the Inspector	No further change	Richborough Estates
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	Noted, this change could be made, if requested by the Inspector	No further change	Richborough Estates

with the wording of criteria 11 of Policy TB19 as set out in the proposed Main Modifications.			
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