

**Keele Neighbourhood Plan
Consultation Statement V1.1
May 2025**

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1. Introduction

This Consultation Statement accompanies the submission of the Keele Neighbourhood Development Plan (**Date**). It summarises the earlier community engagement and includes a detailed analysis of representations received through the the Regulation 14 consultation. It shows how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) have been satisfied.

2. Summary of Community Engagement

2.1 Community and Stakeholder Engagement (Pre-Regulation 14)

Community and stakeholder engagement has been undertaken throughout the plan-making process and has informed the aims and policies of the neighbourhood plan, together with evidence and data on various issues.

Engagement activities included:

- Formation of a Keele Neighbourhood Plan group with members of the community, Keele University and Keele Parish Council: May 2016
- Creation of an email circulation list: June 2016
- Production of Keele Neighbourhood Plan Website: June 2016
- Creation of a Keele Neighbourhood Plan Facebook page: June 2016
- Drop in events for the community: November 2016
- Initial Meetings with local businesses and school: November 2016
- Initial questionnaires to the community: Feb 2017
- Initial questionnaires to students at Keele university: May 2017
- Ongoing updates in Parish Council newsletter, Facebook, website and bulletin: ongoing
- Options consultation events: Jan 2018
- Consultation on local green space designations with the community and landowners: June 2021
- Direct mailings to residents and local businesses
- Stakeholder consultation for regulation 14: February 2021
- Residents' consultation for regulation 14: February-March 2021
- Use of Parish Council noticeboards, University and local business locations to display posters advertising g events, including the regulation 14 consultation: ongoing

2.2 Key Issues

The main planning issues identified by the community and stakeholders were:

- Preserving the rural character and historical assets of the parish
- Preventing excess housing development and maintain protection offered by Greenbelt from urban sprawl
- Preservation of existing green space and historic parks and gardens
- Reducing traffic congestion, speeding and encouraging sustainable transport
- Improving public transport links by increasing number of destinations buses go to
- Illegal parking
- Improvement of local shops
- Improved community facilities
- Development of children's play area in within Keele village
- Provision of a range of housing to maintain a diverse community. This should include social housing and smaller dwellings to allow for young people and for downsizing.
- Improvement to broadband

3. Pre-Submission Consultation (Regulation 14)

3.1 How the Consultation Was Undertaken

Publicity

- The Regulation 14 consultation was advertised on the Parish Council web site, the Keele Neighbourhood Plan website, various Facebook groups including the Keele Parish Council Face book page
- Via the Keele Parish Council email bulletin
- Notices were placed in Parish Council noticeboards, Silverdale and Town Libraries, Keele Practice surgery, St John's Church porch, Keele Student Union, student residences, bush shelters in Keele
- Social media: Keele Paris Council Facebook page, Save our Greenspace Facebook page, Keele Community Facebook page
- Flyers were delivered to all residences in the ward

Accessibility

- Copies of the Neighbourhood Plan were placed in Silverdale Library, Town library, St John's Church porch, Keele Student Union
- The Plan was made available on the Parish Council web site, together with links to key supporting documents.
- Four drop-in events were held at Keele Village Hall (x2), St John's Church, Keele University
- People were invited to respond on-line or in written form and at drop-in events.

Legal Compliance

The consultation has undertaken against the context of Regulation 14 of the The Neighbourhood Planning (General) Regulations 2012 and also consultation case law, including compliance with Gunning Principles. The Plan was at a 'formative stage', so capable of amendment. The Plan was

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made available, with supporting information, to allow 'intelligent consideration'. The consultation as open for six weeks, so allowed 'adequate time for consideration and response'. Representations made have been given 'conscientious consideration', as set out in the fourth section of this statement.

3.2 Statutory Consultees

The following table lists the statutory consultees, contacted at the beginning of the consultation period.

Organisation	Address	Email address
LOCAL AUTHORITIES		
Newcastle-under-Lyme Borough Council		planningpolicy@newcastle-staffs.gov.uk
Staffordshire County Council	Wedgwood Building, Block A, Tipping Street, Stafford, ST16 2DH	james.chadwick@staffordshire.gov.uk planning@staffordshire.gov.uk
Staffordshire County Council Highways	2 Staffordshire Place, Tipping Street, Stafford ST16 2DH	highways@staffordshire.gov.uk
NEIGHBOURING LOCAL AUTHORITIES		
Cheshire East Borough Council	Spatial Planning Team, Cheshire East Borough Council, Westfields, Middlewich Road, Sandbach CW11 1HZ	localplan@cheshireeast.gov.uk
Shropshire Council	Shropshire Council, Planning Policy & Strategy Team Shirehall, Shrewsbury, SY2 6ND	planning.policy@shropshire.gov.uk
Stafford Borough Council	Forward Planning, Stafford Borough Council, Civic Centre Riverside, Stafford, ST16 3AQ	forwardplanning@staffordbc.gov.uk
Stoke-on-Trent City Council	Planning Policy, Civic Centre, Glebe Street, Stoke-on-Trent, ST4 1HH	localplan@stoke.gov.uk
Staffordshire Moorlands District Council	Regeneration Manager, Staffordshire Moorlands District Council, Moorlands House, Stockwell Street, Leek ST13 6HQ	forward.plans@staffsmoorlands.gov.uk

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PARISH COUNCILS		
Audley Rural Parish Council	Mrs C Withington - Clerk to Audley Parish Council The Croft, Barthomley Road, Audley, Stoke on Trent, ST7 8HU	clerk@audleyparishcouncil.gov.uk
Betley, Balterley & Wrinehill Parish Council	Mrs Muna Clough c/o Peach Tree House, Calveley Hall Lane Calveley, Tarporley, Cheshire, CW6 9LG	betley.balterley.wrinehill@gmail.com
Chapel and Hill Chorlton Parish Council	Mrs Janet Simpson - Clerk to Chapel and Hill Chorlton Parish Council	chapelandhillchorltonpc@gmail.com
Keele Parish Council	Debra Powell 10 William Coltman Way, Swallows Rise, Tunstall, Stoke-on-Trent, ST6 5BX.	clerk.keeepc@gmail.com
Kidsgrove Town Council	Clerk to Kidsgrove Town Council, Town Hall, Kidsgrove, Stoke-on-Trent, ST7 4EL	admin@kidsgrovetowncouncil.gov.uk
Loggerheads Parish Council	c/o Loggerheads Community Fire Station, Market Drayton Road, Loggerheads, TF9 4EZ	clerk@loggerheads-pc.gov.uk
Madeley Parish Council	Natalie Lovell - Clerk to Madeley Parish Council, Brookfield House, Lower Ruele, Staffordshire ST20 0BG	parish.clerk@madeley.staffslc.gov.uk
Maer & Aston Parish Council	Elena Sudlow - Clerk to Maer Parish Council The Garden House, Maer, Newcastle, ST5 5EF	maeraston@hotmail.com
Silverdale Parish Council	Debra Powell - 10 William Coltman Way Swallows Rise, Tunstall, Stoke-on-Trent, ST6 5BX	clerk@silverdale.staffslc.gov.uk
Whitmore Parish Council	Debra Powell – Clerk to Whitmore Parish Council 10 William Coltman Way, Swallows Rise, Tunstall, Stoke-on-Trent, ST6 5BX	Parish.clerk@whitmoreparishcouncil.co.uk
NEIGHBOURING PARISH COUNCILS		
Alsager Town Council	Alsager Town Council, 3 Lawton Road, Alsager, Cheshire, ST7 2AE	clerk@alsagertowncouncil.gov.uk

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Barthomley Parish Council	Mark Bailey – clerk to Barthomley Parish Council 4 Post Office Square Madeley Staffordshire CW3 9PG	mbailey87@hotmail.com
Weston & Crewe Green Parish Council	Weston & Crewe Green Parish Council, Chapel Cottage Englesea Brook, Crewe, CW2 5QW	westonandcrewegreenpc@gmail.com
Odd Rode Parish Council	The Parish Office, Newfield House, Brook Lane, Astbury, Cheshire, CW12 4TJ	oddrodeclerk@gmail.com
Doddington & District Parish Council	Parish Clerk, 185 Alton Street, Crewe, CW2 7PU	clerk@doddingtondistrict.org.uk
Hough and Chorlton Parish Council	Rose Villa, Foden Avenue, Alsager, Stoke-on-Trent, ST7 2PT	clerk@houghandcharlton-pc.gov.uk
Norton in Hales Parish Council	Laurel House, 12 Pemberton Close, Ightfield, Whitchurch SY13 4BF	nortoninhalespc@outlook.com
Market Drayton Town Council	18 Frogmore Road, Market Drayton, Shropshire, TF9 3AX	townclerk@marketdrayton.gov.uk
Sutton upon Tern Parish Council	Woodseaves, Market Drayton, Shropshire, TF9	suttonparishcouncil@hotmail.co.uk
Cheswardine Parish Council		clerk@cheswardineparishcouncil.org.uk
Standon Parish Council		clerk@standonparishcouncil.gov.uk
Swynnerton Parish Council		clerk@swynnertonparish.gov.uk
Biddulph Parish Council	Biddulph Town Council, Town Hall, High Street, Biddulph, Staffordshire ST8 6AR	office@biddulph-tc.gov.uk
Eccleshall Parish Council	Eccleshall Parish Council, 16, Newport Road, Great Bridgeford, Stafford, ST18 9PR	clerk@eccleshall.staffslc.gov.uk
Woore Parish Council	Woore Parish Council, North Barn, Church House Farm, Coole Lane, Nantwich, CW5 8AB	clerk@wooreparishcouncil.gov.uk

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Church Lawton Parish Council	Church Lawton Parish Council, c/o Rose Villa Foden Avenue, Alsager, ST7 2PT	clerk@churchlawton-pc.gov.uk
CONSULTATION BODIES		
The Coal Authority	Planning And Local Authority Liaison, 200 Lichfield Lane Berry Hill, Mansfield, Nottinghamshire, NG18 4RG	planningconsultation@miningremediation.gov.uk
Homes England	Windsor House, Homes England, 6 th Floor, 50 Victoria Street, London, SW1H 0TL	enquiries@homesengland.gov.uk
Natural England	Consultation Service, Hornbeam House, Electra Way Crewe Business Park, Crewe, Cheshire, CW1 6GJ	Consultations@naturalengland.org.uk
Environment Agency	Environment Agency, Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, WS13 8RR	WestMidsPlanning@environment-agency.gov.uk swwmplanning@environment-agency.gov.uk
Historic England	The Axis, 10 Holliday Street, Birmingham, B1 1TG	peter.boland@historicengland.org.uk midlands@historicengland.org.uk
Network Rail	Town Planning Team LNW, Desk 122 - Floor 1, Square One, 4 Travis Street, Manchester, M1 2NY	TownPlanningLNW@networkrail.co.uk
Highways England	Network Strategy West Midlands, Highways Agency C3 5 Broadway, Broad Street, Birmingham, B15 1BL	PlanningWM@highways.gsi.gov.uk
Marine Management Organisation		consultations.mmo@marinemangement.org.uk
ELECTRONIC COMMUNICATIONS CODE OPERATORS		
Cornerstone Telecommunications Infrastructure Limited (Vodafone UK & Telefonica UK)	The Exchange, Building 1330, Arlington Business Park, Theale, Berkshire, RG7 4SA	emf.enquiries@ctil.co.uk
British Telecommunications Plc	81, Newgate Street, London, EC1A 7AJ	

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EE Ltd (EE, Orange & T Mobile)	Trident Place, Hatfield Business Park, Mosquito Way, Hatfield, Hertfordshire AL10 9BW	
Hutchinson 3G Ltd	Star House, 20 Grenfell Road, Maidenhead SL6 1EH	
PRIMARY CARE TRUST		
North Staffordshire Clinical Commissioning Group		enquiries@staffsstoke.icb.nhs.uk
UTILITIES		
Energy Providers	To search for the electricity and gas operators in your area, search at: http://www.energynetworks.org/info/faqs/who-is-my-network-operator.html	nationalgas.uk@avisonyoung.com
Western Power Distribution	Western Power Distribution, Toll End Road, Tipton DY4 0HH	nged.energyplanning@nationalgrid.co.uk
National Grid	Amec Foster Wheeler E&I UK, Gables House, Kenilworth Road, Leamington Spa, Warwickshire CV32 6JX	See above
National Grid	National Grid House, Warwick Technology Park Gallows Hill, Warwick, CV34 6DA	box.landandacquisitions@nationalgrid.com
SP Energy Networks	SP Energy Networks, Data Management (England and Wales), Prenton Way, Prenton, CH43 3ET	requestforplansmanweb@sppowersystems.com
Energetics Electricity	Fenick House, Lister Way, Hamilton International Technology Park Glasgow, G72 0FT	Site.midlands@energetics-uk.com
Cadent Gas	Block 1, Floor 1, Brick Kiln Street, Hinckley, LE10 0NA	plantprotection@cadentgas.com
Severn Trent Water	Operations Management, Asset Protection (Waste Water) West Regis Road, Tettenhall, Wolverhampton, WV6 8RU	growth.development@severntrent.co.uk

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United Utilities	External Planning Liaison, Ground Floor, Thirlmere House, Ingley Mere, Liverpool Road, Lingley Green Avenue, Warrington, WA5 3LP	Andrew.Leyssens@uuplc.co.uk planning.liaison@uuplc.co.uk
VOLUNTARY ORGANISATIONS ETC		
Saltbox	Adelaide House, Adelaide Street, Burslem, Stoke-on-Trent, Staffordshire, ST6 2BD	email@saltbox.org.uk
Staffordshire Chamber of Commerce	Commerce House, Festival Park, Stoke On Trent, ST1 5BE	info@staffordshirechambers.co.uk
Stoke-on-Trent and Staffordshire Local Enterprise Partnership	Stoke-on-Trent and Staffordshire Local Enterprise Partnership, Judges' Chambers, County Buildings, Martin Street, Stafford, ST16 2LH	joanne.kemp@enterprisestokestaffs.org.uk
Disability Solutions	North Staffordshire Medical Institute, Hartshill Road, Stoke-on-Trent ST4 7NY	general@disability-solutions.net
Support Staffordshire	Support Staffordshire (Staffordshire Moorlands), Bank House, St Edward Street, Leek, Staffordshire, ST13 5DS	Staffordshiremoorlands@supportstaffordshire.org.uk
Age UK North Staffordshire	83-85 Trinity Street, Hanley, Stoke-on-Trent ST1 5NA	info@ageuknorthstaffs.org.uk
Age UK	Age UK, Tavis House, 1-6 Tavistock Square, London WC1H 9NA	contact@ageuk.org.uk
OTHER CONSULTEES		
Sport England		planning.central@sportengland.org
Canals and Rivers Trust	Canal & River Trust, Red Bull Wharf, Congleton Road South, Church Lawton, Stoke-on-Trent, Staffordshire, ST7 3AP	customer.services@canalrivertrust.org.uk
HS2	HS2 Limited, Two Snowhill, Snowhill Queensway, Birmingham, B4 6GA	HS2Enquiries@hs2.org.uk
Staffordshire Fire and Rescue Service	Pirehill, Stone, Staffordshire, ST15 0BS	contact@staffordshirefire.gov.uk
Staffordshire Police	Staffordshire Police Headquarters, PO Box 3167 Stafford, ST16 9JZ	stoke.cru@staffordshire.pnn.police.uk

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Staffordshire Wildlife Trust	The Wolseley Centre, Wolseley Bridge, Stafford, ST17 0WT	info@staffs-wildlife.org.uk k.dewey@staffs-wildlife.org.uk (Planning Officer)
Keele University		estates@keele.ac.uk
Active Travel England		Planning-Advice@activetravelengland.gov.uk

4. Responses to Representations

This part of the statement summarises the representations made in response to the Regulation 14 consultations, together with the Parish Council's response.

Reference (policy or page)	Representation	Response
National and Statutory Bodies		
Organisation: Network Rail		
N/A	Network Rail Ltd comments on neighbourhood plans. Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order). Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered. Network Rail – railway specific advice notice to LPAs/Developers Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents	Comment noted. Whilst there are no active railways in the Parish, redundant assets e.g. railway tunnels are of relevance. No reference is made to redundant assets in the representation but we are aware that development close to or above the site of old tunnels remains a matter which requires Network Rail to be notified.

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	risks/issues that are different/unique to the risks posed by works taking place adjacent to non-railway undertaker land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal. Asset Protection Comments: Developments in the policy area should be notified to Network Rail to ensure that: (a) Access points / rights of way belonging to Network Rail are not impacted by developments within the area. (b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g. • Drainage works / water features • Encroachment of land or air-space • Excavation works • Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues • Lighting impacting upon train drivers' ability to perceive signals • Landscaping that could impact upon overhead lines or Network Rail boundary treatments • Any piling works	Action: Issue brought to the attention of Newcastle-under-Lyme Borough Council (NULBC)
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	• Any scaffolding works • Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949) • Any use of crane or plant • Any fencing works • Any demolition works • Any hard standing areas For any proposal adjacent to the railway, Network Rail would request that a developer constructs (at their own expense) a suitable steel palisade trespass proof fence of at least 1.8m in height. All initial proposals and plans should be flagged up to the Network Rail Town Planning at the following address: Email: TownPlanningNWC@networkrail.co.uk Railway Station Consideration should be given in Transport Assessments to the potential for increased footfall at Railway Stations as a result of proposals for residential development / employment areas within the neighbourhood area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking, the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions. Level Crossings Developments within the neighbourhood area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon any level crossings with mitigation implemented as required. We would encourage the Council to adopt	
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	specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail. Contributions will be sought where proposals impact on level crossings to mitigate the impacts of those developments. Where level crossing closure is the only option, the applicant is advised that closure would be via s257 of the T&CPA, and that closure would be required before the occupation of any dwellings. Network Rail – railway specific advice notice to LPAs/Developers Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents risks/issues that are different/unique to the risks posed by works taking place adjacent to non-railway undertaker land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.	
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Organisation: Historic England		
KNP-5 KNP-6 KNP-7	The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area. If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan. Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:- <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>	This appears to be generic guidance for those embarking on Neighbourhood Plans rather than a response to the specific policies of this Neighbourhood Plan. A heritage and character assessment formed part of the evidence base for developing policies. No change necessary.

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	You may also find the advice in <i>“Planning for the Environment at the Neighbourhood Level”</i> useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from: <http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf> If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, <i>“Housing Allocations in Local Plans”</i> as this relates equally to neighbourhood planning. This can be found at <https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/>	
Organisation: Environment Agency		
KNP3 To limited degree KNP 2 and 12	Newcastle Under Lyme Level 2 Strategic Flood Risk Assessment (SFRA), March 2025, provides assessment of potential site allocations within the Newcastle Under Lyme. Some of those sites fall within the NP boundary. Additionally, it is important that the NP within the area offers a robust confirmation that development is not impacted by flooding and that there is sufficient wastewater infrastructure in place to accommodate growth for the duration of the plan period. We refer you to the Water Cycle Study Phase 2 July 2024 report undertaken as evidence to support the local plan. We note the site falls across three Water Framework Directive (WFD) catchments. One of these includes the Checkley Brook - Upper Water Body which is currently afforded ‘good’ ecological status. The second area includes Park Brook Catchment (trib of Trent) Water Body which is currently afforded ‘moderate’ ecological status. The third catchment is Meece Brook from Source to Chatcull Brook Water Body which is classed at ‘poor’ ecological status. Local WFD catchment data can be obtained from: River Basin Catchment Data Explore Site Allocation: There are no strategic site allocations for housing in the NP. However, there is a strategic site allocation relating to Keele University and Science Park (allocation E8 employment development). The NP includes Policy: E8 employment	Comment noted. Sentence on flood risk added to evidence chapter. Policy ‘KNP 5 Sustainable Design and Character’ amended to make reference to impacts of surface water run-off. Reference also added in the evidence section of the Plan in a new section ‘Other Factors’.

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	development. It is not clear on the exact boundaries, but we assume this is site 1 as shown in Figure 2: Key Employment Sites. Based on our Flood Map for Planning, the site is entirely within Flood Zone 1, the low-risk zone. We note there is an unnamed ordinary watercourse to the southeast of the site (site 1 on Figure 2) which flows to that direction and it falls outside of the development boundary. This ordinary watercourse is un-modelled based on the scale and nature of the stream and receiving catchment (less than 3km²). It should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the Councils drainage team as the Lead Local Flood Authority (LLFA). It is noted that pluvial flooding has been considered within the draft ND plan although there is no reference to fluvial flood risk matters. Based on our records, there are three Radioactive Substance Regulation points within the E8 employment development site. They could be material in the ground, or it could be storage as part of the university science park. Any planning application should assess such material or similar material within the ground. You are advised to utilise the Environment Agency guidance (attached) which should assist you moving forward with your Plan. We would not offer detailed bespoke advice on Policy but advise that you ensure conformity with the adopted Core Strategy and, in consideration of the emerging Newcastle Under Lyme Local Plan, during Plan reviews.	Policy updated to remove risk of unintended consequences and incompatibility with Green Belt Policy. This would be a matter for NULBC as part of the development management process. The Basic Conditions have been amended.
Organisation: The Coal Authority		
n/a	Re: Keele Parish Neighbourhood Plan Thank you for your notification of the 13th February 2026 seeking the views of the Coal Authority on the above.	Comments noted. Reference added to coal mining features in

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	The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records indicate that within the Keele Parish Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. It does not appear that the Neighbourhood Plan proposes to allocate any new sites for development and on this basis we have no specific comments to make.	the Neighbourhood Area in the evidence section of the Plan in a new section 'Other Factors'.
Organisation: Sport England		
KNP 10	Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 103 and 104. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy	This appears to be generic guidance for those embarking on Neighbourhood Plans rather than a response to the specific policies of this Neighbourhood Plan. The area of the neighbourhood plan benefits from extensive sporting facilities on the University Campus, which are available to the public. Policy KNP4 deals with community facilities including sporting facilities. The

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	Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance	interpretation to this policy has been amended to make reference to sports facilities on the Keele University Campus. Policy KNP10 designates Local Green Space and Policies KNP5 and KNP11 support active travel.
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	If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.	
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	NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/activedesign <i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i> If you need any further advice, please do not hesitate to contact Sport England using the contact details below.	
Organisation: Staffordshire County Council		
General Comments KNP 8	Archaeology / Historic Environment The positive approach outlined with regards to preserving and enhancing Keele's heritage/historic environment in the draft Neighbourhood Plan is certainly welcome. The production of the draft has been informed by a detailed Heritage and Character Assessment, which albeit was produced over eight years ago, provides a strong baseline for the development of robust heritage-related policies. Indeed, an appreciation of the parish's historic environment, its significance and potential, is woven like a thread through the draft plan. This reflects the recognition of the importance of the role of the parish's historic environment to the local community during the Community and Stakeholder Engagement activities. The inclusion of heritage-specific/adjacent policies, such as KNP-5, 6, 7, 8 & 9 are welcome, as is the approach to highlighting in many of the other policies that support would be provided for developments that did not have significant adverse impacts on the historic or rural character of the area. There is necessarily, given their landscape scale and national significance, a heavy weighting in the draft plan policies towards the conservation areas and registered park	Comments Noted. Policy KNP8 amended through the addition of a historic farmstead clause. Below ground archaeology is already dealt with in national policy and guidance and local plan policy, so it is unnecessary to repeat this. Reference added to below ground

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	and garden (KNP6 & 7), whilst KNP8 acknowledges the important role that historic field patterns and traditional stone walls play in contributing to the character of the parish. However, whilst historic farmsteads are mentioned in the design and heritage section of the draft (Page 13) there is no specific consideration of these, or indeed other heritage assets in the area, such as below ground archaeology (e.g. the Staffordshire Historic Environment Record shows that plan area includes a possible Roman road, the earthwork remains of medieval field systems, and historic mineral railway remains) in any of the policies. It is suggested that this could be remedied by mentioning and considering these in KNP-8 and its associated interpretation. For reference, some useful inspiration for including non-designated heritage assets, historic farmsteads and archaeology, can be found in the Whittington and Fisherwick Neighbourhood Plan. SCC's Historic Environment Team would be more than happy to discuss our comments further with the Parish Council in due course. We assume that they have also consulted Historic England and NULBC's Conservation Officer on the draft plan too. If not, it is recommended that they do so. Staffordshire County Council adopted a new Local Transport Plan (LTP) in January 2026 which is supported by the Bus Service Improvement Plan (BSIP) and Local Cycling and Walking Infrastructure Plan (LCWIP). Suggest that the definition of active travel is expanded to include wheeling – walking, wheeling and cycling. Policy wording for the following allocations in Newcastle's emerging Local Plan provides details of the transport improvements needed: SP11, KL13, KL15 and TB19. It is noted that section 5.1 contains a list of infrastructure priorities. S106 contributions can only be sought from development where they meet the tests set out in Regulation 122 of the CIL regulations. Maintenance and repair of existing issues would generally	archaeology and listed features in the representation to the heritage section of the evidence chapter to the Plan. Reference to these documents added to the evidence chapter of the Plan. Active travel definition expanded to include 'wheeling'. Wording updated to read 'planning infrastructure monies'.
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	not meet these tests. S106 contributions can also only be collected for matters directly related to the development under consideration.	
KNP 1	The policy point e. sets out there would be no blocking of public access or footpaths, which is supported. However, the policy could go further in this regard to require public access and footpaths to be improved where possible/relevant.	Reference to public access or footpaths moved to Policy KNP11 and has been expanded.
KNP 5	Policy is supported. Active Travel Infrastructure should be designed according to Local Transport Note LTN1/20	Reference to Active Travel Infrastructure should be designed according to Local Transport Note LTN1/20 added to interpretation.
KNP 6	See general comments	Comment noted.
KNP 7	See general comments	Comment noted.
KNP 8	Policy KNP-8: Rural and Natural Environment is welcomed. In point 2a, there is a reference to Ancient Woodland. It should be noted that historically only woodlands of 2 hectares (ha) and above were assessed for designation as Ancient Woodland. Recently Staffordshire Ecological Record (based at the Wildlife Trust) has been working on a project with Natural England to assess all woods between 0.25ha and 2 ha. This has added some 7000 woods to the Staffordshire Inventory. It is very likely that these include woods in Keele. The data have not yet been released by Natural England. It is possible that SER could offer additional information for the NP, such as 'a further x woods are now considered Ancient', ahead of release. Contact info@staffs-ecology.org.uk for advice on this matter	Policy KNP8, clause 2 already refers to woodlands in general not just ancient woodlands. Interpretation amended to make reference to the interactive DEFRA Magic Map for latest

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		information on landscape designations.
KNP 9	Policy is welcomed	Comment noted.
KNP 11	Suggested amendment to wording – development should provide transport improvements to mitigate their impact.	Policy KNP11 clause1 amended to include reference to transport improvements to mitigate their impact.
Organisation: National Gas Transmission		
General comments	National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. Proposed sites crossed or in close proximity to National Gas Transmission assets An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below. • https://www.nationalgas.com/land-and-assets/network-route-maps Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure. Distribution Networks	Comments noted.

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	Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com Further Advice Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:	
Organisation: Natural England		
KNP 8	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information. Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species . Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic	Comment noted.

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	Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice. We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary. Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.	
Organisation: national highways		
KNP 11	Thank you for providing National Highways with the opportunity to consult on the draft Neighbourhood Plan for Keele Parish Council. National Highways (formally Highways England) has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In responding to development plan consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management considerations. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies. The SRN closest to the NDP area is the M6 Motorway. We have considered the contents of the draft Neighbourhood Plan and as the plan does not introduce any new development sites or transport related policies that are likely to impact upon our network, we consider that the contents of the plan are for local	Comment noted.

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	determination, and we have no other comments to make.	
Organisation: Keele University		
General	2.1 Keele University comprises a single campus site, close to Newcastle under Lyme. The campus offers a unique working, living and learning environment from which it delivers world class education and research, as well as supporting a range of commercial businesses within the Innovation Park. 2.2 However, the University is operating in an increasing competitive environment where learning buildings, student experience facilities and public realm play a key role in recruitment and retention. The University must continue to evolve to maintain credibility, improve the environmental performance of the estate, and ensure that the large areas of open space and numerous heritage assets of which the University are custodians, are maintained. 2.3 Keele University's Strategic Vision 'Our Future' aims for the University to continue to grow as a research-led institution recognised for excellence in education, research and enterprise. The campus is a key asset for the University and a fundamental reason why staff, students and commercial business choose the University. 2.4 The University is developing a Capital Investment Plan (CIP) to provide a fit for purpose, environmentally and financially sustainable campus in the long term. It is important that the emerging Newcastle Under Lyme Local Plan and this draft Neighbourhood Plan supports the objectives of the CIP, to achieve the Borough's wider economic, social and environmental objectives. Current Planning Policy Context 2.5 The saved policies of the Newcastle Under Lyme Local Plan 2011 and associated Policy Map identify a large area of the campus as an 'inset area', outside of the designated Green Belt, though not benefitting from any specific allocation or associated policies (see Figure 2).	Comments noted. The map that accompanies Policy KNP12 is taken from the Keele University's published Masterplan. Throughout the process, the Parish Council has contacted Keele University and asked if there are more up to date versions of the map. The representation indicates a lack of awareness that there was extensive liaison with Keele University Estates Team in developing the policy wording.

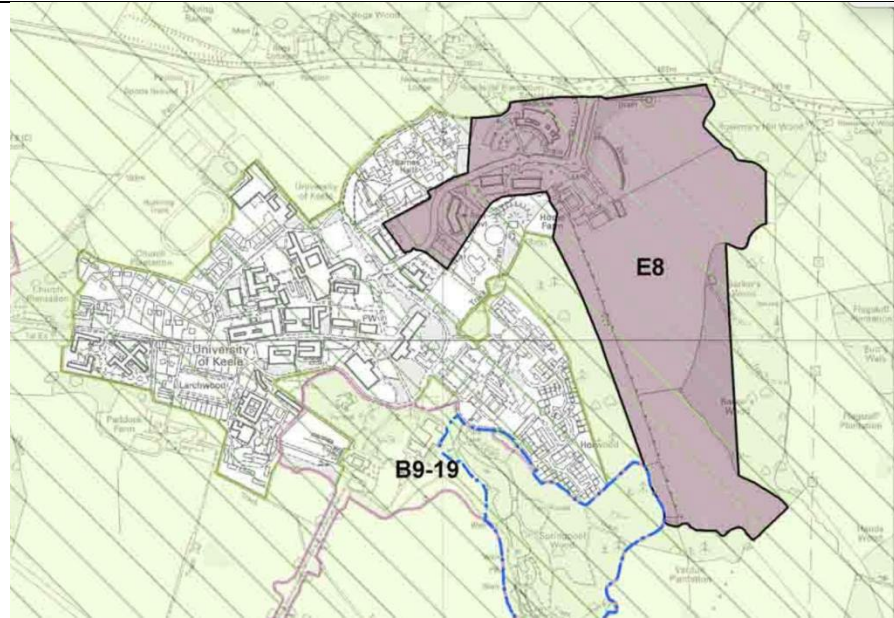


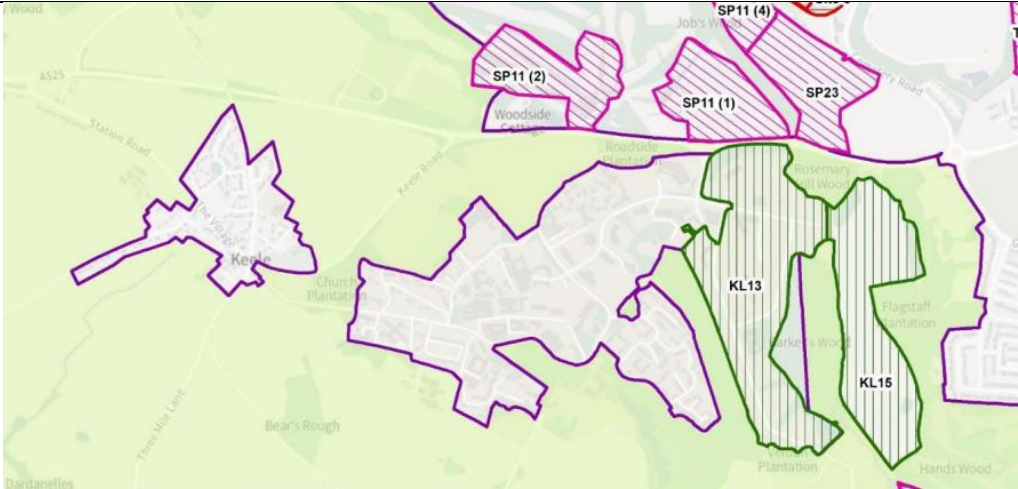
Figure 1

The adopted Plan did identify land to the east of the campus under Policy E8 (Keele University and Keele Science Park) including specific reference to education-related academic, employment and student housing uses considered to be acceptable in that area.

2.7 These designations and associated policies are expected to be superseded in the coming months by the adoption of the emerging Newcastle Under Lyme Local Plan, which is currently in the latter stages of Examination in Public.

2.8 The draft Policy Map accompanying the emerging Local Plan, identifies both Keele Village and developed areas of the Keele University Campus, as areas outside of the surrounding Green Belt (see Figure 2). Additionally, site allocation KL13 replaces former Local Plan area E8, and KL15 to the east is introduced to form new mixed use areas of the wider University Campus.

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	 2.9 The Neighbourhood Plan should reflect the emerging designations and support the associated policies to ensure conformity with the final version of the Local Plan in accordance with the basic conditions as set out in paragraph 8(2) of schedule 4B of the Town and Country Planning Act 1990.	
KNP 1/ 2	In order for a Neighbourhood Plan to be made, it must meet a set of basic conditions. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are: a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order (or neighbourhood plan). b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.	Parish Council is aware of the legal requirements for Neighbourhood Plans, including the recent changes to the Basic Conditions.

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	c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders. d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). f) the making of the order (or neighbourhood plan) does not breach and is otherwise compatible with EU obligations. g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan). 3.2 The following detailed representations respond to the Regulation 14 Neighbourhood Plan consultation within the context of the above conditions. The Strategic Objectives 3.3 The University is broadly supportive of the objectives and ambitions of the Neighbourhood Plan, particularly where these seek to protect the character of Keele, enhance green infrastructure and environmental quality, and support sustainable development. 3.4 The University is committed to working collaboratively with local stakeholders to deliver these shared objectives alongside its own long-term investment strategy. 3.5 The draft Neighbourhood Plan at Page 11 (first paragraph) currently states that there are no strategic housing allocations within the area. 3.6 This position is now out of date and it is recommended that the plan be amended to reflect the emerging Newcastle-under-Lyme Local Plan, which is progressing through Examination in Public and identifies Site Allocation KL13, and KL15, which includes an element of housing associated with the University. 3.7 A significant proportion of the evidence base referenced within the Neighbourhood Plan dates from 2017 or earlier. Given the scale of change in planning policy,	Keele University did work closely with the Parish Council, especially the at earlier stages. This emerging Local Plan is still at
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	environmental requirements and local development pressures since that time, it is essential that the evidence base is reviewed and updated. 3.8 It is recommended that the Neighbourhood Plan should also be updated to ensure that all policies are consistent with the development plan, in order to ensure conformity in line with the basic conditions and to ensure that the plan remain effective in the medium to long term.	Examination Stage, so the strategic site allocations cannot be assumed. However, the section on the emerging local plan (2.4) already makes reference to strategic site allocations and has been updated and could be updated again at the examination stage if necessary.
KNP 8	3.9 The University supports the overarching aims of Policy KNP8 in enhancing biodiversity and environmental quality. 3.10 However, as currently drafted, the policy is overly prescriptive and does not adequately reflect the guidance within the NPPF and the policies within the emerging Local Plan. 3.11 In particular, Point 4 of KNP8 appears to require a level of Biodiversity Net Gain (BNG) provision that exceeds the provision required through national policy and the Local Plan. The required provision of 20% BNG has not been tested from a viability perspective and risks making proposals unviable. 3.12 Other elements of the draft policy risk duplicating or conflicting with environmental legislation, which is outside of the planning system. 3.13 It is recommended that Policy KNP8 is amended to align with national BNG requirements, avoid unnecessary duplication of legislative controls; and ensure flexibility in delivery.	The biodiversity clause has been carefully worded and has taken account of national policy and guidance. Similar clauses in other Neighbourhood Plans have been accepted at the examination stage. The policy has had regard to national policy and guidance and deals with material planning considerations only.

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KNP8	3.14 The emerging Local Plan identifies the delivery of a new link road between the KL13 allocation and TB19 as a strategic piece of infrastructure intended to support planned growth, improve network resilience and address existing and future traffic pressures. The principle of the link road is to provide a north to south route, from Keele Road towards the A53 to support traffic and enhance public transport flows through this part of the district. 3.15 This infrastructure is of strategic importance and will deliver a range of benefits, including improved connectivity, enhanced public transport accessibility to Keele Village, and wider sustainability benefits in reducing congestion and supporting modal shift. Thus, supporting the objectives of the Neighbourhood Plan. 3.16 It is necessary to update the Neighbourhood Plan to reflect this aspiration and ensure the delivery of the link road does not conflict with the plan. It is therefore recommended that Figure 5 of the draft plan, and other elements of the plan where relevant should be updated to reflect the aspirations for a new strategic link road through the Keele University campus and land to the south adjacent to the A53. This will support the sustainable infrastructure aspirations of both the Neighbourhood Plan and emerging Local Plan.	If the emerging Local Plan is adopted before the examination, changes can be made to the Policies and evidence chapters where necessary. Comment noted. NULBC could amend the maps at the examination stage, depending on the progress of the emerging Local Plan.
KNP 9	3.17 The University supports the overarching intention of Policy KNP9 to protect and enhance landscape character. However, it is considered that Part 2 of the policy must be supported by robust and proportionate landscape evidence to justify the approach to limiting development in these areas. 3.18 Furthermore, the policy should incorporate a clear and proportionate mechanism through which development proposals can be supported where justified, having regard to site-specific circumstances and wider sustainability considerations. 3.19 In its current form, the policy risks being overly restrictive and may not fully align with the presumption in favour of sustainable development set out in the National Planning Policy Framework.	Policy KNP9, clause 1 amended to refer to significant adverse impacts. The policy has taken account of national policy and guidance and is evidenced based including the AECOM Heritage and Character Assessment, which was

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	3.20 It is recommended that Policy KNP9 is revised to ensure it is evidence-based, sufficiently flexible, and consistent with national policy, enabling appropriate development where justified.	provided by the National Programme.
KNP 10	3.21 The status and intended function of proposed green space designations should be clarified, to ensure consistency and clarity in line with similar designations in the emerging Local Plan. The current policy wording suggests that the designation is “similar to Green Belt but not the same”, which introduces ambiguity and risks confusion in interpretation and application. 3.22 This terminology is also inconsistent with established national policy definitions and may lead to uncertainty in decision-making. 3.23 We recommend that reference to the designation being “similar to Green Belt” is removed, and that the policy is amended to provide clear and consistent terminology aligned with national policy, ensuring clarity and effectiveness.	Interpretation to Policy wording amended for clarity.
KNP 12	3.24 The University strongly supports the positive aspirations of the policy relating to the campus and its recognition within the Neighbourhood Plan. 3.25 However, it is essential that the policy clearly supports the implementation of the University’s Estates Masterplan and facilitates the continued evolution and investment in the campus. In this regard and in order to ensure consistency between key documents, we recommend that references to the ‘University Masterplan’ should be updated to the ‘most recent masterplan document’, reflecting its iterative and evolving nature.	Comments noted. The map that accompanies Policy KNP12 is taken from the Keele University’s published Masterplan. Throughout the process, the Parish Council has contacted Keele University and asked if there are more up to date versions of the map.

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	3.26 In addition, supporting text indicating that the policy “does not encourage stylistic imitation” should be removed, as it is unnecessarily prescriptive and may constrain high-quality and innovative design responses. 3.27 This is to ensure that the policy should provide a clear, flexible, and unambiguous framework that supports growth and investment consistent with the University’s strategic role.	The wording is the exact opposite of what is being suggested here. Interpretation to policy amended to refer to innovation.
Figure 8	3.28 As per similar comments above, we recommend that Figure 8 be updated to accurately reflect Local Plan allocations KL13 and KL15 and to confirm correct site boundaries. 3.29 This is necessary to ensure consistency with the emerging development plan and to provide clarity for decision-makers and applicants.	Comments noted. Throughout the process, the Parish Council has contacted Keele University and asked if there are more up to date versions of the map. Action: Asked Keele University for latest version of the map to be replaced in the Plan. No response received
Section 4 Green Guidance Note	3.30 The draft Neighbourhood Plan contains a section entitled ‘Green Guidance Note’. Beyond the broadly understood aspiration principles, which are understood, it is unclear what the intended status or application of the guidance is intended to be. 3.31 We recommend that an introductory paragraph is added to provide context to this guidance and that this guidance, if it remains in the documents is cross-referenced to specific policies within the Neighbourhood Plan.	Purpose added to the ‘Green Guidance Note’, for clarity and headings amended.

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	3.32 This will assist in clarifying the weight to be applied to this guidance in decision-making and ensure that the Plan is effective in practice. 3.33 The content should also be reviewed to ensure alignment with the National Planning Policy Framework and the emerging Local Plan. 3.34 Furthermore, we recommend that the reference to “small wind turbines” is clearly defined within the Plan. 3.35 Without a clear definition, there is potential for ambiguity and inconsistent interpretation in decision-making.	
Section 5.1 Infrastructure Projects	Similarly to Section 4 above, the status of this guidance section is unclear. 3.37 Specifically, the list of infrastructure projects should be clearly justified and should be fairly and reasonably related to development, in accordance with relevant policy and legal tests for planning obligations. 3.38 The Plan should also recognise the importance of continued investment in the Keele University campus, including its role as a major local employer and its contribution to the wider community. 3.39 It is recommended that Section 5.1 is reviewed to ensure that infrastructure requirements are appropriately justified, proportionate, and reflective of the strategic role of the University within the area.	Wording amended to refer to planning infrastructure monies.
Conclusions	4.1 This Representation has been prepared by nineteen47 on behalf of Keele University in response to Keele Neighbourhood Plan (Regulation 14) Consultation. 4.2 Keele University is a key stakeholder in Newcastle Under Lyme and the wider region. The University is committed to working proactively with the Neighbourhood Plan group to establish a comprehensive approach to the University’s estate strategy.	Comments noted. The Parish Council has worked closely with Keele University and continues to do so.

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	4.3 The comments set out in this representation are intended to: 4.4 Subject to the recommended amendments, it is considered that the Neighbourhood Plan can provide a sound and effective part of the Development Plan for guiding development in Keele. 4.5 The University remains committed to ongoing engagement with the Parish Council and other stakeholders as the Plan progresses. • ensure alignment with the emerging Local Plan; • improve clarity and effectiveness of policies; and • support the continued growth and investment of the University.	
Organisation: Newcastle under Lyme Borough Council (NuLBC)		
General Comments	NuLBC wishes to place on record that it commends the Steering Group, Parish Council & residents of Keele on the engagement undertaken as well as the time, thought, effort and resource that has been invested by all involved. The Council are keen to develop and maintain a close working relationship with Keele Parish Council to ensure issues are addressed and that both the Neighbourhood Plan & emerging Local Plan documents are in general conformity with each other. In the absence of formal residential allocations (to contribute to meeting the identified requirements) in Keele's neighbourhood plan, it is important to emphasise the provisions of the NPPF that would consequently be invoked if this position is maintained. In particular, paragraph 14 highlights the implications and prospective risks for the weight that can be afforded to the neighbourhood plan in such circumstances. The comments made should also be viewed through the prism of the wider changes to the planning system and legislation currently emerging, such as provisions of the Levelling Up and	Comments noted. Table added of permissions and allocations to the evidence base section. Additional numbering and heading formats added for clarity. Figures have been provided by NuLBC and added to Plan document

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	Regeneration Bill which is now starting to manifest in neighbourhood plan examinations as exemplified by the highlighted text in the addendum found on p6 below. This state of flux further emphasises the value of as great a degree of clarity as possible being expressed in the interpretation wording of each of the neighbourhood plan's policies to aid understanding & their intended application, whilst ensuring their alignment to local and national policy. The specific comments raised below are presented under the relevant Chapter/Section headings of the Neighbourhood Plan. For ease of future reference & tying consultation comments to specific sections of the document, I would advocate using paragraph numbers in subsequent iterations of the neighbourhood plan. This would bring benefits to all parties and make the administrative aspects of responding to points raised easier to collate & address.	
Introduction	Section 1.1 Purpose of the Plan: Consideration should be given to expanding this section to provide absolute clarity on intent. For example, does it wish to strengthen the community's voice, set a vision for how the Parish will evolve, seek to protect specific environmental assets, influence development. If so, this should be clearly elucidated at the outset and as informed by the engagement undertaken to date. Section 1.2 Status of the Plan: Explain the rationale behind the ten-year horizon (2025-2035) being determined as most appropriate, noting that the emerging Local Plan is 2020-2040. Notably also the SEA & HRA screening exercise pre-dates 2025. Section 1.3 Implementation, Monitoring and Review: The role of the Borough Council in the development management process should be highlighted.	Section 1.1 amended to include further description. The 2035 date is based on the AECOM HNA. However, if NULBC has a more up to date figure for the Parish, this could be substituted and the end date could be amended accordingly. Reference added to the Local Planning Authority and its role.

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	The mechanisms & indicators for monitoring policy should be detailed & included as part of an appendix to the neighbourhood plan. Changes to the NPPF are anticipated (in Summer 2026) following consultation recently undertaken on the December 2025 document and the Neighbourhood Plan should carefully consider its content where relevant to the Plan's production and application. This includes the potential opportunity afforded by Neighbourhood Priority Statements as an alternative to neighbourhood plans. In future iterations of the Neighbourhood Plan, more detail could be provided on the steps taken to date in its production and the necessary stages still to be addressed before the neighbourhood plan can become made. This could be done either in succinct written form or a diagram.	This is a matter for current and future councillors in the Parish to decide. The Neighbourhood Plan cannot pre-empt changes to the NPPF. It is not necessary for the Neighbourhood Plan to describe the statutory process. However, the Basic Conditions Statement sets out how legal requirements have been met.
Background	Background Section 2.1 The Neighbourhood Area: Can the household and population figures be broken down further to differentiate between the resident and student make-up of the Parish.	This is based on publicly available ONS census data. The details are held in the Local Green Space report

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	Section 2.2 Community and Stakeholder Engagement: Further background information on the details of these various activities should be collated including photos and publicity material as part of the consultation statement to accompany the submission of the neighbourhood plan. The decision to progress a borough-specific Local Plan was made over 5 years ago and with the time horizon for the neighbourhood plan stated as commencing in 2025, it may be prudent to reword or delete the section on obstacles to timely progress. Explain what a TRO is & what it means in practical terms. Section 2.3 National Policy Context: Please see earlier comments re: the updated NPPF. Section 2.4 Local Policy Context: We recognise that the (Neighbourhood) Plan is being prepared during a period in which a Borough-wide Local Plan is also emerging, and the Parish Council should consider the interactions between the two in preparing their Plan. To aid this process, thought could be given to the value of undertaking a Health Check assessment by	and Householder survey analysis. Dates added to activities listed in section 2.2 Paragraph deleted. Sentence deleted as it relates to non-planning matters. Noted, but this can't be changed until the new NPPF is issued. This may happen during the examination process. The national programme has now closed and the technical support for this is no longer available. However, our consultants were a partner in all 4
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	qualified independent parties to provide advice on any potential amendments required to ensure the basic conditions are met (this also extends to national planning policy and advice) . If possible, include more information on the granting of consent for 200 new homes e.g. does this include the Hawthorn's site in Keele Village and the land north of Pepper St. highlighted in section 2.2? Were these schemes granted permission in advance of 2025? Reference to the 2023 NPPF is perhaps misplaced. Earlier sections (such as 2.3) referred to the 2024 version. Any rewording on this also needs to be viewed in the context of the new NPPF to be published in the coming months. On the emerging Local Plan, allocations KL13 & KL15 relating to Keele University's development ambitions should be fully referenced and had regard to. It's also worth noting that, depending on your progression, the Local Plan may be adopted in advance of any further iterations of the neighbourhood plan. Section 2.5: Evidence and Planning Rationale: Housing - Are you confident that this August 2017 Housing Needs Assessment remains contemporary owing, for instance, to 2021 census data subsequently being available and also changes in market conditions (for reasons such as tax & regulation changes) impacting on the private rented sector.	national programmes and has supported around 250 NP's. Table added on housing consents and allocations. Noted. NPPF references updated. Text added on policies in the emerging Local Plan relating to strategic sites. <i>Action: reference added to the strategic sites</i> If NULBC has a more up to date figure for the Parish, this could be substituted and the end date could be amended accordingly. Action: Table added on housing consents and allocations from data provided by NuLBC.
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	For commitments & completions we calculated 587 (rather than 588), but it would be useful for you to clarify the component sites (i.e. KL13 & KL15) in addressing the housing need balance (from 800). The disparities between the neighbourhood plan 2025-2035 and local plan 2020-40 time horizons is significant in this context also, as the 800 figure relates to the 20 year period of the Local Plan. Local Employment and Community Facilities - Define what is meant by community facilities (or maybe refer to KNP-4 as detailing this), & the assertion that Keele has a limited range of range should be revisited as it does not seem to align with the services highlighted in the subsequent paragraphs and the value afforded by the University campus as well as the Parish's connections & proximity to Newcastle's town centre. St Johns CE primary school could be added to the list of services to be found in Keele. Design and Heritage - The Government has published an updated Design Guide and this alongside other relevant & up to documents should be referenced accordingly. The 2017 Heritage and Character Assessment should also be evaluated to determine the contemporary extent (all or in part) of its applicability to the neighbourhood plan. Countryside and Environment - Is it possible that the Defra Magic Map is linked as a footnote to allow any interested parties to access this directly.	Word 'limited' deleted. Added to list. Action: Checked the facilities listed on page 12 with KNP4 policy list and made sure they were the same. This is at a consultation stage and the Plan could be amended at a later stage when it is published. Links could expire, so the DEFRA Map is best accessed as a web search.
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	Transport and Infrastructure - Provide the date of the Department of Transport strategy titled 'Gear change a bold vision for cycling and walking'. It would be useful too if the 4 themes could be explained further and how the neighbourhood plan accords with each. Keele University - The Borough Council will defer to any consultation comments received from the university and how this is represented in the neighbourhood plan including the appropriate referencing of the Estate Strategy and Masterplan. (* see comment)	Text amended to delete the DfT reference and the updated Staffordshire County Council LCWiP added. Keele University have been approached for an updated map of the estate and masterplan area.
Section 3.1 Planning Aims:	Section 3.1 Planning Aims: A word appears to be missing in point i. after 'and...'	'and' removed.
KNP 1	1 Residential Development: does this suggest/is the policy's intent that brownfield sites irrespective of them being infill would be supported in existing built areas. If further text could be added to the interpretation section to clarify this aspect that would be useful	Interpretation amended for clarity to include reference to brownfield sites.
KNP 2	Residential Mix and Affordable Housing: Specify the Local Plan policy (HOU2 Housing Mix and Density?) that KNP-2 is looking to augment.	Interpretation amended to include reference to HOU2.
KNP 3	Employment: Does this policy extend to the preservation of the existing uses in these localities & where for reasons of no longer being suitable or viable, other uses may be appropriate? Given the sensitivities around the nature of the site, perhaps the cemetery could be removed from the list also. It might as well be appropriate to keep the University campus separate (as part of KNP-12) owing to its nature and scale being so different to the other locations listed. Defining the type of employment uses (having regard to the Use Class order) as part of the interpretation will aid understanding of policy intent.	Keele University campus left in for consistency with the later policy. Cemetery removed and list updated. Action: Added road names to all the employment uses listed in the policy and reviewed the list. Removed the

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		cemetery and others where there is a conflict such as the golf driving range, which this policy supports its change of use and KNP4 protects it..
KNP 5	Sustainable Design and Character: Do the pedestrian priority streets referred to in the interpretation text include accessibility for cyclists also? It's also perhaps worth having regard to the recent consultation (and its subsequent final publication in due course) on the Design and Placemaking Planning Practice Guidance . Design Codes produced at County level may also emerge in the coming months that are useful to refer to.	Interpretation amended. Reference to the Placemaking Planning Practice Guidance could be added at the examination stage, if the document is published by then.
KNP 6	Keele Village Conservation Area & KNP-7 Keele Hall Conservation Area and Historic Park and Garden: Direct reference could be made to the conservation area appraisals and associated documents either in the policies and/or the interpretation section.	Reference to the Keele Conservation Area Appraisal to interpretation. No Conservation Area Appraisal exists for the other Conservation Area.
KNP 8	Rural and Natural Environment: No overall adverse impacts may be difficult to quantify as part of the planning balance judgement and alternative phrasing of 1. could be explored, such as appropriate compensatory mitigation measures (i.e. offset benefits) should be used to minimise any adverse impacts. How is the 20% figure for Biodiversity Net Gain justified? - this does not align with Local Plan Policy SE7: Biodiversity Net Gain, which whilst it albeit states at least a 10% measurable net gain, this represents a key benchmark figure. Local need and viability is integral to any variance from this & it will need to be fully reasoned as to why 20% is considered appropriate in Keele.	Policy wording amended replacing "overall" with "significant", to better reflect national policy. 10% is a minimum requirement in legislation. Many Local Plans and Neighbourhood Plans now request 20% for greenfield sites,

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		reflecting priorities in national policy.
KNP 9	Landscape Setting and Coalescence: Figure 6 Green Gaps – It's unclear as to the justification for their inclusion, especially given the extent of Green Belt. There is also no detailed argument presented that there is a substantive heightened risk from development of coalescence, along with any consequent erosion of distinctive character and landscape setting within the areas where the Gaps are highlighted. Therefore, it may be worth reflecting on whether you consider that the practical application of such a policy stance would stand up to scrutiny in the determination of development proposals. On this basis, whilst there could be value in retaining these for information & contextual purposes within the Neighbourhood Plan, it perhaps should not be assumed that they would provide any additional layer of protection beyond what the statutory designations (such as Green Belt) provide at present. Are the two areas highlighted in 2. Referenced in Figure 6? If not, it could be worth making each of these distinct.	The AECOM Design Code, February 2021 provides the justification for the green gaps. The green gaps should be considered against the historic environment and natural environment chapters of the NPPF, not just the green belt chapter. The policy would also be relevant to the special statutory duties for heritage. The interpretation already makes this clear. Map amended to interpretation. Action: amended map fig 6) to make distinct the 2 fields shown in clause 2 of the policy to interpretation.

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	It is also important to acknowledge that work to accompany the new Local Plan may also reveal areas of Grey Belt across the Borough and this will play a part in determining the relative merits of sites for allocation.	The policy is more related to historic and natural environment, rather than green belt. It should be noted that the special statutory duties relating to heritage would apply to grey belt sites.
KNP 10	Local Green Space: With reference to paragraph 107 of the NPPF any designations need to be demonstrably special, and it is important that in each circumstance for LGS1 & LGS2 you are confident that the additional designation is necessary and would serve a useful purpose. It is also important to engage with any owners of the land in question. The Health Check highlighted above will be valuable in these regards.	The Local Green Space report includes analysis against NPPF criteria and underpins the designations. An informal consultation was undertaken with landowners and wider public.
KNP 12	Keele University Estate: Restating the comments made under Section 2.4 earlier, specific mention should be made to Local Plan allocations KL13 & KL15. Details of the date of publication of the university's masterplan is also advised to set the benchmark year. The wording of 5. could be construed negatively in the way harmful alterations are mentioned. If this could be softened to for example, unsympathetic. Similarly, this change in phrasing may also be applicable to the final paragraph of the implementation text.	Comment noted. "harmful" changed to "unsympathetic".
Green Guidance Note	Section 4.1 Key Principles for Sustainable Development Whilst understanding the concept, is the mixed-use aspect relating to the parish when viewed as a whole, rather than the neighbourhood plan advocating this within future development proposals? Section 4.3 Landscape and Green Infrastructure: The first & third paragraphs could be amalgamated.	Paragraph updated. Paragraphs amalgamated.

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Infrastructure Priorities	A community infrastructure levy has not been established for Newcastle under Lyme, nor is it anticipated that one would be established in the future. Regard will however continue to be had to the changing regulatory landscape on this issue. Whilst the infrastructure expenditure priorities are noted, any contributions yielded via s106 would need to have satisfied the requisite legal tests to ensure the planning obligations are necessary to make developments acceptable in planning terms.	Wording updated to refer to “planning Infrastructure monies”.
Addendum	Examiner letter to the Coldean Neighbourhood Planning Forum dated 16 March 2026 (pertinent parts highlighted in blue) – double click on the icon below to show:	Comments noted and this will be addressed in the Basic Conditions Statement.
Organisation: United Utilities		
General remarks	Allocations for New Development Following our review of the NP, we note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for Newcastle-Under-Lyme. If this were to change, we would request early dialogue so that we can inform the site selection process and ensure any issues that are a concern to us are highlighted to you as early as possible. Our Assets It is important to outline the need for our assets to be fully considered in any proposals in the NP Area. Uuw will not allow building over or in close proximity to a water main. Uuw will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances. Site promoters should not assume that our assets can be diverted.	Comments noted. Evidence base section updated to include reference to United Utilities and a separate informal guidance note for developers.

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	On occasion, an asset protection matter within a site can preclude delivery of a proposed development. It is critical that site promoters / applicants engage with UUW on the detail of their design and the proposed construction works. All UUW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services). We strongly recommend that the LPA advises future applicants / promoters of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. We ask site promoters to contact UUW to understand any implications using the below details: Developer Services – Wastewater Tel: 03456 723 723 Email: SewerAdoptions@uuplc.co.uk Developer Services – Water Tel: 0345 072 6067 Email: Watermains@uuplc.co.uk Please note that UUW does not provide water and wastewater services to all parts of the Parish and therefore site promoters / applicants should also speak to other water / wastewater providers as appropriate.	
Planning Aims	Planning Aims UUW welcomes the Planning Aims, in particular point iii), which identifies the need for development to be sustainable and well designed. Sustainability and climate resilience should be ‘golden threads’ that guide the preparation of planning policy. A critical element of climate resilience is sustainable water management, which we have considered further below.	Comment noted.

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KNP 5	Within this policy, we note point 12 which states: ‘2. Development should include sustainable urban drainage, including permeable hard-surface areas to allow drainage of surface water.’ Whilst we welcome this wording, we request that the policy on sustainable drainage is expanded upon as it is a critical element of the response to climate change. We recommend the following wording for inclusion in the NP. This could be included as a separate policy or as part of amendments to Policy KNP-5. ‘Where required by the local planning authority, applications must be supported by a strategy for foul and surface water management. Surface water must be discharged in accordance with the surface water hierarchy in the National Standards for Sustainable Drainage Systems or any replacement guidance. The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted. Applications will be required to incorporate sustainable drainage which is proportionate to the nature and scale of the proposal. The sustainable drainage must be multi-functional wherever possible, and designed in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment. Explanatory Text Application of the hierarchy for managing surface water is a key requirement for all development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted to demonstrate why alternative preferable options in the surface water hierarchy are not available.	Comments noted. Evidence base section updated to include reference to United Utilities and a separate informal guidance note for developers.
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	Foul and surface water drainage must be considered early in the design process. Sustainable drainage must be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance. The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low-lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.' The final two sentences of this explanatory text are particularly important to the Parish of Keele given the second bullet point of Code 20 of the Design Code. This notes the need to carefully consider buildings, which are lower than the road network.	
KNP 9	We note the green gap that is identified on Figure 6. We wish to highlight that we own and operate a wastewater pumping station in this location. Whilst we are keen to ensure that landscapes are appropriately protected, we also request flexibility in future planning decisions to allow for investment in our infrastructure to ensure that we are able to appropriately respond to future growth and environmental drivers.	The policy would not restrict permitted development rights related to utility providers.

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	4.2 Green Design UUW welcomes the below references in this section. <i>‘• living (green) walls or roofs as part of the design;</i> <i>• rainwater capture, storage and reuse (grey water) such as connecting rainwater goods to a water butt or collection of bath water;</i> <i>• sustainable urban drainage incorporated into the landscape design;</i> <i>• using permeable materials for hard surfaced areas;’</i>	Comments noted.
Keele Neighbourhood Plan Design Code Final Draft Report (February 2021)	Code 11 Landscaping UUW recommends the following additional bullet point to this code: <i>‘Landscaping proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management.’</i>	The design code was commissioned under the national programme and cannot be amended at this stage. However, The design code has informed the policies in the neighbourhood plan and these can be amended. Policy KNP5 clause 3 amended to take account of landscape proposals and tree lined streets.

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	Code 20 Water and Drainage We welcome the text within this policy, however, we request that this provides specific examples of SuDS features. In doing so, we recommend that you refer to the following resources: https://www.susdrain.org/case-studies/ https://www.rhs.org.uk/garden-features/rain-gardens https://raingardens.info/wp-content/uploads/2012/07/UKRainGarden-Guide.pdf Reflecting our above comments, we also recommend the following additional wording to the second bullet point of Code 20: ‘It is common in Keele for the buildings to be located lower than the road network, creating risk of surface water run-off towards the property. The position of the development in relation to the road network should be considered within the design process. Any surface water drainage should be mitigated in these circumstances. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer. Early consultation with the wastewater undertaker is strongly recommended to ensure that any risk of sewer surcharge is minimised through the detailed design of a site and the proposed drainage system.’	Reference to guidance added to Green Guidance Note. The design code was commissioned under the national programme and cannot be amended at this stage. However, The design code has informed the policies in the neighbourhood plan. Evidence base section updated to include reference to United Utilities and a separate informal guidance note for developers.
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	6. Design Guidelines Within section 6.1 , we request that point 11 is amended as follows: ‘Incorporate necessary existing and proposed services and drainage infrastructure without causing unacceptable harm to retained features. Before commencing the design process, it is essential to confirm what utilities infrastructure exists, the details of any easements that are required and any associated restrictions on the design and construction process. Utility assets can be critical constraints that affect developable area, details of levels and landscaping, and details of services that cross an existing utility asset. Utility assets could also affect the deliverability of a proposal.’ Household Extensions Under the heading of Household Extensions, we request the following additional bullet point: • ‘Before commencing the design of any household extension, it is essential to confirm whether there are any utilities within or adjacent to the boundary of your property as these could affect the ability to build your proposed extension, as well as the detail of any design, the approach to construction and approvals you may require.’	
Residents and Landowners		
GDPR ref: 1		
KNP 9	I appreciate the intention to protect the fields around Keele and keep them green. I would suggest that other fields should be named as having particular landscape value as part of the setting of Keele Conservation Area – as you drive towards Keele up three mile lane the openness on both sides is worth preserving, as is the view from Keele drive in the direction of the Shropshire hills. The ridge behind top farm is also a special skyline from the A525 and also from the Highway Lane side. The Keele conservation area has a field bordering it at the end of Pump Bank which needs to be preserved as part of conserving the conservation area. There are still clear furrows in it of the ancient strip farming which can be seen when the sun is low.	

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	Ideally, all the fields on Figure 6 need strong protection from being built on.	
GDPR ref: 2		
KNP 8/9	I strongly support the protection of green spaces and the rural character of Keele. The natural environment — woodland, wildlife and open landscapes — is one of the most valuable aspects of living here and should remain a priority in future development	Comments noted. Various policies protect green spaces and landscape.
KNP 12	, I would like to raise a concern regarding the condition of roads on the campus. In many areas, temporary surface repairs appear to be short-term solutions, and some sections may require more substantial maintenance. Road quality affects safety, particularly for families with children.	Road maintenance issues fall outside of the scope of the Plan. No change necessary
KNP 12	As a family with three children, I would also like to suggest consideration of a dedicated children's playground within the residential areas of the campus. There are many families living here, and a safe and accessible play area would significantly improve community wellbeing and make the campus more attractive for long-term staff residents.	This would be a matter for Keele University, rather than something planning policy can address. No change necessary.
KNP 12	In addition, before approving further residential development, it may be helpful to assess the current use of existing housing and student accommodation, as some properties appear under-occupied. Improving and optimising existing housing stock could be considered alongside new construction.	This would be an accommodation management issue for Keele University and outside of the scope of the Plan. No change necessary.
KNP 12	As the campus includes a significant number of staff families who reside here for several years, it may also be valuable to consider policies that support long-term residential stability. A stable and settled community contributes positively to social cohesion, local schools and overall wellbeing.	This would be an accommodation management issue for Keele University and outside of the scope of the Plan. No change necessary.

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Anon.		
KNP 9	The Greenbelt needs preserving. It exists especially for the people who live in the towns	Anonymous: no name nor address.
Anon.		
KNP 9	It is vital that the Greenbelt is maintained. It was introduced for a reason-to protect urban sprawl (sic) and to keep the identity of villages and communities such as Keele. That reason remains valid. Small adjustments can be justified but not wholesale eradication. Now, more than ever, with UK biodiversity-and food security-under threat, the maintenance of open farmland/ countryside is essential	Anonymous: no name nor address

Appendix 1

Keele Neighbourhood Plan Consultation Statement

INDEPENDENT EXAMINATION OF THE COLDEAN
NEIGHBOURHOOD DEVELOPMENT PLAN 2020-2035
EXAMINER: DEREK STEBBING BA (Hons) DipEP MRTPI

Examination Ref: 03/DAS/CNP

Debbie Annells
Coldean Neighbourhood Planning Forum

Carly Dockerill
Brighton & Hove City Council

cc. Kevin Wright, South Down National Park Authority

Via email

16 March 2026

Dear Ms Annells and Ms Dockerill

You will be aware that sections 98¹ and 99² of the Levelling-up and Regeneration Act 2023 will be coming into force on 25 March 2026. This is by virtue of *The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026*, which were made on 2 March 2025.³

In relation to neighbourhood plans, sections 98 and 99 amend the Planning and Compulsory Purchase Act 2004⁴ and the Town and Country Planning Act 1990⁵ in respect of the legal compliance and the Basic Conditions requirements.

In summary, the further legal compliance requirements are as follows:

- so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, the plan must be designed to secure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change; and
- so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, the plan must be designed to take account of any local nature recovery strategy under section 104 of the Environment Act 2021 that relates to all or part of the neighbourhood plan area.

In addition, there is a new Basic Condition requirement:

- the making of the neighbourhood development plan would not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made. **Note:** this **replaces** the former Basic Condition that the neighbourhood plan be in general conformity with the strategic policies contained in the development plan for the area.⁶

¹ View at: <https://www.legislation.gov.uk/ukpga/2023/55/section/98>

² View at: <https://www.legislation.gov.uk/ukpga/2023/55/section/99>

³ View at: <https://www.legislation.gov.uk/uksi/2026/169/made#top>

⁴ Section 38B of the 2004 Act: <https://www.legislation.gov.uk/ukpga/2004/5/section/38B>

⁵ Paragraph 8(2), Schedule 4B to the 1990 Act (and s.38C to the 2004 Act):

<https://www.legislation.gov.uk/ukpga/1990/8/schedule/4B> and

<https://www.legislation.gov.uk/ukpga/2004/5/section/38C>

⁶ Basic Condition '(e)' is replaced by '(ea)'.

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A further Basic Condition⁷ related to the new environmental assessment framework⁸ is commenced albeit, until such time as a completed framework for the implementation of Environmental Assessment Reports is in place, compliance with this Basic Condition cannot be assessed.

As the examination of the Coldean Neighbourhood Plan is currently in progress, I am providing you with an opportunity to comment on these changes. I also consider that any persons who may have an interest in the examination should be given the similar opportunity to comment, including those who submitted representations at Regulation 16.

Therefore, I request that Brighton & Hove City Council place a notice on their website cross referencing this letter, advising that the anyone with an interest in the examination may, should they wish, comment on the legal compliance and Basic Conditions changes outlined above.

It should be made clear that there is no need for responses to repeat representations that have already been made in relation to any other matters (since the Regulation 16 representations stand as submitted). Similarly, it is not an opportunity to raise new matters that do not relate to these legal points.

I suggest that the local authority's website should advise that **2 weeks** will be provided to submit comments to Brighton & Hove City Council. I would also request Brighton & Hove City Council contact those who made representations at Regulation 16 to this opportunity. Should any person(s) request additional time in order to respond, you should seek to accommodate this providing a revised and reasonable response time is proposed.

Any responses received at the end of the 2 week (or, where requested, extended) period, along with those of the Coldean Neighbourhood Planning Forum and Brighton & Hove City Council, should be forwarded to the IPe office team for my attention.

Should you have any questions in relation to this letter or any other related examination matters, please contact the IPe office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Neighbourhood Forum, the South Downs National Park Authority and City Council's websites.

Thank you in advance for your assistance.

Yours sincerely

Derek Stebbing

Examiner

⁷ New Basic Condition '(fa)'.

⁸ Part 6, Levelling-up and Regeneration Act 2023: <https://www.legislation.gov.uk/ukpga/2023/55/part/6>