



Newcastle-Under-Lyme Local Plan 2020-2040



First Draft Local Plan Regulation 18
Consultation Report 2024

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1. Introduction

1.1. Newcastle-under-Lyme Borough Council undertook consultation on the First Draft Local Plan 2020 - 2040 from June through to August 2023. This followed consultation on an Issues and Strategic Options document published in 2021/22.

1.2. This consultation statement sets out in respect of the First Draft Local Plan: -

- The stakeholders invited to take part in the consultation
- The consultation and publicity methods used
- The material that was subject to consultation
- A summary of the main issues received
- An initial response from the Council to the main issues raised.

1.3. The Council is required to consult with stakeholders at different stages of developing a Local Plan; the first of which is under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 (preparation of a local plan) requires the Council to notify stakeholders that it is preparing a plan and to invite them to make comments with their views on what the plan should contain. There is flexibility in how the initial stages of consultation and plan preparation can take place.

1.4. The Council's Statement of Community Involvement (SCI) ¹ sets out how the Council will involve sectors of the community in the planning process. The SCI has been followed in undertaking the consultation on the First Draft Local Plan.

2. Consultation Documents

2.1. The Council consulted on the following documents: -

- First Draft Local Plan (2020 – 2040)
- Interim Sustainability Appraisal (incorporating Equality Impact Assessment)
- Interim Habitats Regulations Assessment

2.2. The Council also published various evidence-based documents online. The draft proposals (draft allocations and designations) were also made available to view via an online First Draft Local Plan Policies Map².

3. Consultation Process

3.1. Consultation on the First Draft Local Plan took place from Monday 19th June to close of business hours on Monday 14th August 2023. Comments were invited on the First Draft Local Plan, Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). In addition to the consultation documents, a formal notice and comments form was also published. An interactive map showing the draft proposals was also published on the Council's website.

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

² <https://www.newcastle-staffs.gov.uk/planning-policy/local-plan>

3.2. Consultation comments could be made using a dedicated online consultation portal (Keystone Objective), via email to the Planning Policy team or by post to the Council Offices at Castle House, Barracks Road.

3.3. The First Draft Local Plan, copies of the HRA and SA alongside copies of comment's forms and a formal notice were made available online and distributed in paper copy to the following libraries:

- Newcastle Library, Castle House, ST5 1BL
- Clayton Library, ST5 3HW
- Silverdale Library, ST5 6LY
- Talke Library, ST7 1RA
- Kidsgrove Library, ST7 1BS
- Knutton Library, ST5 6EB
- Audley Library, ST7 8DB
- Loggerheads Library, TF9 4NX

3.4. The Council maintains a database of stakeholders for planning policy consultations. The Statement of Community Involvement includes details as to how to register and become a member of the planning policy database. The council has also published a privacy notice as to how it will use personal data in relation to planning policy matters³. The Statement of Community Involvement also lists several 'specific' and 'general' consultees⁴ with representatives of relevant groups present on the planning policy consultation database.

3.5. Statutory consultees and consultees who had signed up to the Planning Policy mailing list received email / letter notification when the consultation went live. E-mail notifications were also sent to Newcastle-under-Lyme Borough Council Councillors, all Town and Parish Councils in the Borough and Members of Parliament (MPs) whose constituencies lie partly or wholly within Newcastle-under-Lyme Borough Council's administrative area.

3.6. The consultation was promoted through a variety of means. These included:

- Via social media: -
 - A total of 4 Twitter posts
 - A total of 7 Facebook posts.
- Updates on the Council website's latest news webpages.
- A video of a Power Point presentation published on the Council's website to explain the Local Plan process. A separate page including a Frequently Asked Questions (FAQs) page was also released online.
- A press release.
- Site notices posted at physical locations where there were site specific proposals included in the Plan. The site notices provided information about the consultation including a link to how comments could be submitted to the consultation.

³ [Planning policy privacy notice – Newcastle-under-Lyme Borough Council \(newcastle-staffs.gov.uk\)](https://www.newcastle-staffs.gov.uk/planning-policy-privacy-notice)

⁴ General and specific consultation bodies and Duty to co-operate bodies are set out in Regulations 2 and 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

4. Consultation events

4.1. The council held a total of 11 ‘drop in’ consultation events where officers were available to answer questions and distribute consultation forms etc. Table 1 (below) lists the respective consultation events and the number of confirmed attendees at each event.

Event	Date	Number of attendees who completed a ‘sign in’ sheet
Silverdale (Library)	22 June 2023	79
Kidsgrove (Town Hall)	28 June 2023	237
Ashley, Loggerheads (Oddfellows Hall)	05 July 2023	40
Audley (Methodist Church)	12 July 2023	191
Madeley (Madeley Centre)	13 July 2023	39
Keele (Village Hall)	20 July 2023	62
Chesterton (Holy Trinity Church)	27 July 2023	57
Silverdale (Methodist Church)	02 August 2023	72
Newcastle-under-Lyme Library (by appointment only)	03 August 2023	11
Bradwell (Bradwell Lodge Community Centre)	08 August 2023	7
Guildhall (NUL Town Centre)	10 August 2023	19

Table 1: List of consultation ‘drop in events’

4.2. Most of the ‘drop in’ events were held for two hours between 5pm and 7pm. The exception was the event at Newcastle-under-Lyme Library on 3rd August where an appointment could be made to speak to a planning officer between 10am – 6pm.

4.3. Copies of the Draft Local Plan, Policies Booklet, SA, HRA, leaflets, posters, FAQs and comment response forms were made available at all events.

4.4. Copies of the Draft Local Plan in large print were also made available upon request.

5. Responses to the Consultation

5.1. A total of 5,159 comments were received from 1,378 respondents during the consultation period. Furthermore, a total of 18 comments, from 14 respondents were made to the Habitats Regulations Assessment and 13 comments from 11 respondents were made to the Sustainability Appraisal.

5.2. The significant majority of responses received to the First Draft Local Plan were made via e-mail followed respectively by letter and the online consultation portal (web). Figure 1 (below) shows the % breakdown by method.

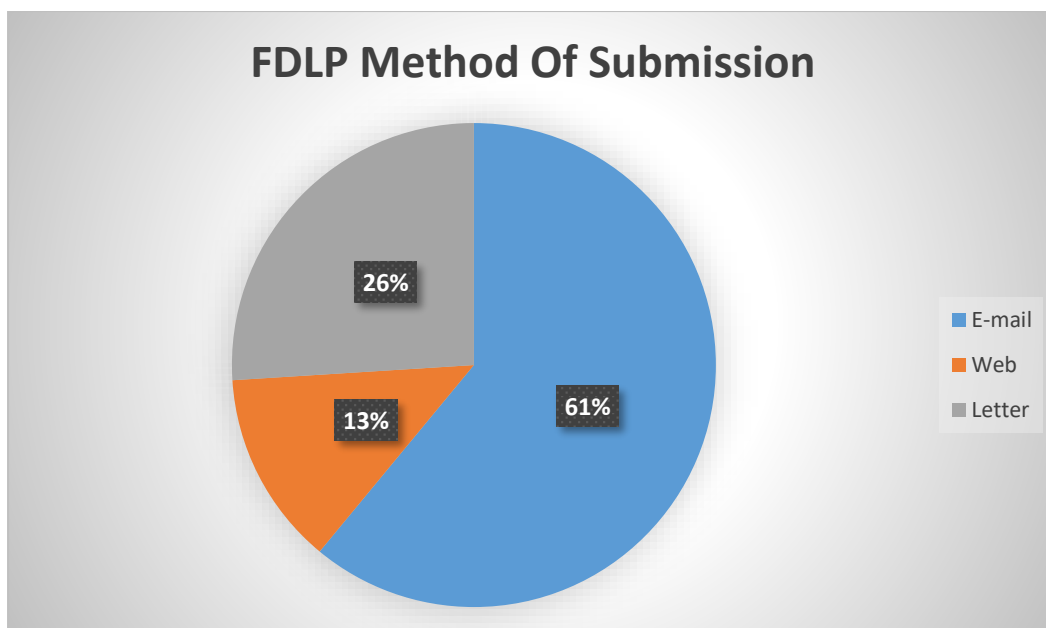


Figure 1: Method of Submission to the First Draft Local Plan.

5.3. Table 2 below presents a breakdown of comments made to individual parts of the First Draft Local Plan consultation document: -

Section	Number of Comments
Newcastle-under-Lyme First Draft Local Plan 2020-2040 - Overall Document	73
Consultation	50
How to respond to the consultation	10
Introduction	23
Sustainability Appraisal and Habitats Regulations Assessment	10
Current Development Plan	5
Neighbourhood Plans	6
Stages of development of the Local Plan	6
Context	17
Vision and Strategic Objectives	47
Vision for the Borough	11
Strategic Objectives for the Borough	27
Approach to Policies	115
Planning for Sustainable Development	18
Policy PSD 1: Overall Development Strategy	75
Policy PSD 2: Settlement Hierarchy	26
Policy PSD 3: Distribution of Development	68
Policy PSD 4: Development Boundaries and the Open Countryside	47
Policy PSD 5: Green Belt and Safeguarded Land	54

Policy PSD 6: Health and Wellbeing	36
Policy PSD 7: Design	25
Climate and Renewable Energy	13
Policy CRE 1: Climate Change	40
Policy CRE 2: Renewable Energy	26
Housing	13
Policy HOU 1: Affordable Housing	45
Policy HOU 2: Housing Mix, Density and Standards	48
Policy HOU 3: Gypsy, Travellers and Travelling Showpeople	13
Employment	14
Policy EMP 1: Employment	15
Retail	7
Policy RET 1: Retail	10
Infrastructure and Transport	18
Policy IN 1: Infrastructure	58
Policy IN 2: Transport and Accessibility	39
Sustainable Environment	11
Policy SE1: Pollution, Contamination and Amenity	25
Policy SE2: Flood Risk, Water Resources and Management	19
Policy SE3: Water Resources and Water Quality	13
Policy SE4: Open Space, Sports and Leisure Provision	36
Policy SE5: Biodiversity and Geodiversity	22
Policy SE6: Historic Environment	16
Policy SE7: Landscape	18
Site Allocations	380
Approach to Strategic Allocations	11
Table 4: Strategic Locations	410
Residential and Employment Allocations	76
Table 5: Proposed Residential and Employment Allocations	2921
Glossary	5
Appendix 1: Monitoring Framework	6
Supporting Information	1
Appendix 2: Employment Sites in Supply	9
Appendix 3: Borough Council Car Parks in Asset Rationalisation Programme	29
Appendix 4: First Draft Local Plan Site Allocations Maps	43
Total	5,159

Table 2: Breakdown of individual comments to the consultation document

5.4. As can be seen above, over 3,000 comments or nearly 65% of all responses were received to tables 4&5 of the consultation document relating to draft strategic locations / allocations to the Plan. It is therefore clear that a large proportion of responses related to draft sites / strategic locations in the Plan.

5.5. There have also been four recorded petitions to the consultation: -

- “Request NULBC to Review Housing Targets for Local Plan”. As at the 04 January 2024, 1,857 people have signed the online petition (this petition was considered at Full Council on the 26 July 2023).
- “Save your Newchapel and Harriseahead Green Belt from housing development” (sites NC77 and NC13) with 88 signatures currently.
- “Housing proposals at Red Street, High Carr Farm, Talke Pitts, Butt Lane, West Avenue and Congleton Road”. This petition claims that infrastructure cannot support the proposed level of development in such a small area and alleges that there are no plans for additional schools or GP surgeries. It contains over 500 signatures.
- ‘Save Hassell Street Car Park’ submitted by several local businesses on Hassell Street, Newcastle included over 450 signatures

5.6. In the annex to this consultation report, the council has identified the main issues raised on a site and / or policy theme basis. All comments have been noted and the analysis of consultation responses will continue in the drafting of the Regulation 19 version of the Local Plan. It is also important to note that it is the planning matters / issues raised that are considered on an ongoing basis in the development of the Local Plan and not just the volume of responses received on individual subject or site.

5.7. Figure 2 (below) highlights the sites and / or strategic locations which received the highest proportion of responses. Given that respondents could make observations on a number of sites in a single response then there are limitations to this approach. It is also the case that the analysis below does not include petition numbers and as such, the data included in figure 2 is indicative and for illustration only.

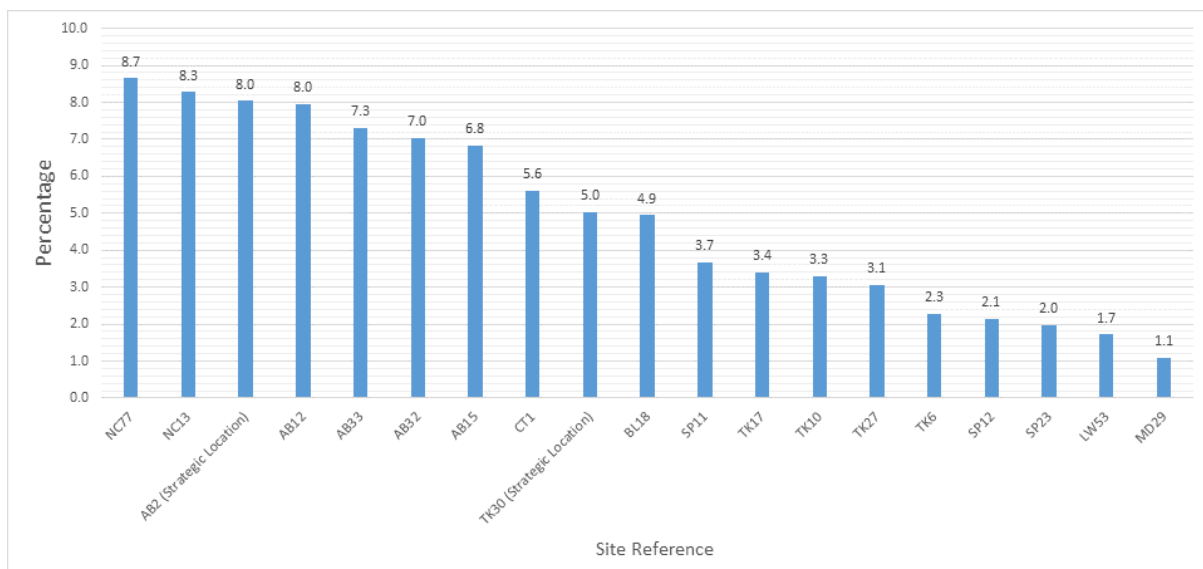


Figure 2: Indicative proportion of responses to sites / strategic locations (Where the response resulted in over 1% of total responses)

5.8. Information was also received from site promoters during the consultation regarding draft allocations / strategic locations, sites discounted through the initial site selection process and / or completely new sites (called ‘omission’ sites). The Council will reflect on this

additional information in continuing to implement the site selection process for the Local Plan.

5.9. Annex 1 to this report sets out the main issues raised to the consultation on the First Draft Local Plan and the council's initial response. It should be noted that a revised version of the National Planning Policy Framework (NPPF) was published on the 20 December 2023 whilst this document was being prepared. As such, references to the National Planning Policy Framework in Annex 1 refer to the previous iteration of the Framework unless specifically stated. The Regulation 19 version of the Local Plan will be prepared in line with the revised NPPF (December 2023).

Annex 1: Main Issues and Initial Council Response

1. Consultation

Summary of Main Issues Raised	Council Response
Consultation document is not written in a way that is accessible.	<p>The process of undertaking the consultation on the First Draft Local Plan is set out in the covering consultation report. The consultation has been undertaken in line with the council’s Statement of Community Involvement (“SCI”). Copies of the consultation documentation were provided in Libraries / customer service centres and made available at the consultation ‘drop in’ events.</p> <p>Responses to the First Draft Local Plan consultation were accepted through the consultation portal but also via e-mail and in letter form. The consultation was held for an eight-week period between June and August 2023 to allow residents to engage appropriately with the process. Comments made to the First Draft Local Plan had to be received in written form to count as a recognised comment to the consultation and this was made clear during the consultation process. The consultation webpages included a dedicated webpage on evidence-based documents. The First Draft Local Plan also included a section recognising the status of Neighbourhood Plans in the borough.</p> <p>In respect of the growth directions, the sustainability appraisal notes that option 6 ‘hybrid approach’ had been progressed as it represents a balanced approach that seeks to support sustainable patterns of development across the borough.</p>
Consultation portal difficult to navigate	
Consultation should not have been conducted during summer break to allow as many resident concerns to be listened to as possible.	
Unable to download document	
Given recent statements by the Secretary of State which suggests changes to the planning system. Many local authorities have put their local plans on hold. Why has NUL continued with their consultation process?	
The staff at the events had little knowledge, often directed consultees to the information boards or one member of staff.	
Staff did not make notes of people’s comments at the consultation events	
Although there were some councillors present there was no declaration of their attendance	
No mention of Neighbourhood plans in consultation process.	
Unclear how comments from this Issues and Options consultation have been taken into consideration for the Draft Plan consultation.	
Regulation18 notice had the incorrect consultation details	
Consultation not advertised	
The number of documents associated with the consultation is overly complicated and time consuming.	
Local Plan refers to multiple documents which are not linked from the report and are not always available on the evidence page	

Audley Parish - We note that the consultation is taking place in the summer over the holiday season, which is not best practice. The document states that it is based on 'evidence documents, ongoing Duty-to-Cooperate discussions, and the responses to the Issues and Strategic Options document'. However, we could not find any summary or analysis of the outcomes of previous consultation or of how previous representations have informed the current document.

Keele Parish - The previous "Issues and Options" consultation outlined 6 possible "growth directions" for the Borough, none of these are referred to in this draft of the local plan, so it is not clear how the previous consultation was used in developing the plan. This undermines the Issues and Options consultation and raises concerns about the consultation process in general. This plan should not only acknowledge the earlier consultation process, but also identify the "growth direction" chosen, and the reasons for its selection.

2. Introduction

Summary of Main Issues Raised	Council Response
Local Plan will consider the need for new homes alongside the need for associated infrastructure	<p>The Local Plan will set out the vision and framework for how the borough will grow up to 2040. The Plan will set out targets for the number of jobs and homes to be delivered in the borough and a spatial strategy to guide development in the most sustainable locations. The Plan is supported by an Infrastructure Delivery Plan, which considers the infrastructure implications of the Plan and the policies contained within it.</p> <p>The introduction section to the First Draft Local Plan includes a section on Neighbourhood Plans in the borough and will be updated in the Regulation 19 version of the Plan to reflect the most up to date position at that time. The introduction also provides background on the decision, in January 2021, to withdraw from the Joint Plan arrangements with Stoke-on-Trent City Council to prepare a single Local Plan for the Borough. Following the consultation, the Plan will be reviewed in the light of consultation responses and additional evidence. On the 19 December 2023, the government published a revised National Planning Policy Framework. The implications of changes made through the revised National Planning Policy Framework will be kept under review during the development of the Final Draft Local Plan.</p>
The First Draft Plan repeats national guidance which could simply be referenced in the supporting paragraphs. This would ensure a more simplified, easier to read document.	
The Borough has been without a Local Plan for over a decade, and the decision to stop the preparation of a Joint Local Plan in January 2021 is not fully explained.	
The Inspector will only consider valid Regulation 19 stage representations at the Examination in Public, and previous representations will not be considered, although references may be made.	
The environmental health issue at Walley's Quarry needs to be resolved before any more houses are built.	
Keele and Silverdale parishes are also completing their Neighbourhood Plans.	

3. Context

Summary of Main Issues Raised	Council Response
<p>Active travel (such as walking to the shop or school) would be compromised with higher levels of car dependency resulting from development taking place in out-of-town locations (including Green Belt land) – physical inactivity & air pollution (with due regard to 3.5 & 3.9) would worsen consequently.</p>	<p>The First Draft Local Plan has been supported by a suite of evidence-based documents such as a site selection report which has sought to evidence decisions made in relation to the proposed allocation of sites in the Borough.</p> <p>The Local Plan is also supported by an Infrastructure Delivery Plan, which considers the infrastructure implications of the Local Plan.</p> <p>The council will review detailed comments / suggestions on the context chapter of the Plan at the Regulation 19 version of the Local Plan. For example, this will look to revise the map of Cheshire East shown on Figure 1 and paragraph 3.7 in response to the comments made by Cheshire East and Natural England, respectively.</p>
<p>The prevalence of excess weight & obesity in the Borough, when viewed alongside the healthy weight priority in the Staffordshire Joint Health and Wellbeing strategy 2022-2027, would indicate that leaving some open green space (with exercise areas) between developments would be beneficial for healthy activity.</p>	
<p>Cheshire East Council - The boundary of Cheshire East is shown incorrectly in Figure 1, which only shows the former boroughs of Congleton and Crewe & Nantwich without the former Macclesfield Borough</p>	
<p>The extent of development proposed at Audley / Bignall End and Red Street (plus other highlighted areas) brings into question how the educational needs of children moving into the area will be met. This is compounded by the lower levels of educational attainment in the Borough & difficulties in recruiting teachers.</p>	
<p>Given the lower levels of unemployment in the Borough, how can the destruction of natural habitats and wildlife be justified to develop warehousing, especially given the existing warehousing being developed in Tunstall</p>	
<p>Why there has been a lapse of time between local plans being implemented, allowing for private landowners to run amok with proposals for development on their land.</p>	
<p>Recognition is noted of the increased numbers of over 65's in the population & that this ought to affect many policy choices.</p>	

<p>The level of housing growth highlighted (as evidenced by the Housing & Economic Needs Assessment) & its alignment to the Standard Method would not support any increase in job creation.</p>	
<p>The 2021 census shows a decrease in population. Why is the need for housing so high & why are there not more high density, imaginative proposals for brownfield sites?</p>	
<p>Site specific comments to NC77: Loss of greenbelt, subsidence & mining legacies, flora & fauna impacts, recreational value, infrastructure including schools & healthcare services, traffic & road network repercussions as well as worsened air pollution.</p>	
<p>Interest rates & inflation could impact on the demand for housing. Lower salaries mean rental prices are currently unaffordable to many people.</p>	
<p>Site specific comments to NC13: The council is urged to review its targets for new housing in the Borough to reflect the actual need (both in number and type of dwellings). Reflecting on neighbourhood & Borough specific housing needs surveys undertaken allied to the constraints of the Green Belt (& it being developed only in exceptional circumstances). Reductions in population forecasts, the nature & character of the rural settlements, delivery rates of new homes over the last decade should all be factored in.</p>	
<p>Development would further limit the access to greenspaces, potentially increasing the health needs of the area.</p>	
<p>Natural England - paragraph 3.7 should be amended to reflect there being a single RAMSAR site in the Borough as well as the respective position re: SSSI status.</p>	

4. Vision and Strategic Objectives

Summary of Main Issues Raised	Council Response
Vision statement should be prepared for each settlement.	The council will consider the vision and strategic objectives in the light of the feedback provided by consultees following the consultation on the First Draft Local Plan. This process will also take account of any updates in relevant Borough Council / Country Council strategies. A decision was taken in January 2021 to withdraw from the joint Plan with Stoke-on-Trent City Council. There continues to be ongoing engagement with the City Council in developing the Local Plan.
Vision should reference the role the Borough should play in contributing to the growth of the region.	
The vision statement purely focuses on new homes and jobs as deliverables. The language in relation to other issues is weak. The vision statement should indicate how the Plan will positively affect the borough. The vision statement in Eden local plan is much more comprehensive.	
The vision / strategic objectives should refer to built heritage and culture.	
Support for the principles set out in paragraph 4.1 regarding brownfield land delivery.	
Support for emphasis on neighbourhood plans.	
More consultation is needed on the Local Plan vision.	
Several of the proposed allocations / proposed strategic locations contradict the vision and strategic objectives.	
Loss of Green Belt is not consistent with several of the strategic objectives.	
Natural England - note the support for a brownfield site first approach. Brownfield sites can have a high ecological value that should be considered through the Local Plan.	
National Highways – agree in principle to the vision and objectives of the draft Local Plan.	
Historic England – would welcome a specific reference to the historic environment and the need to protect and enhance the significance of the local historic environment.	
Environment Agency – SO-IV – support the objective to deliver significant reduction in carbon footprint. Regarding “Greener Construction”, what would be the criteria for deciding that the viability/deliverability tests are met?	

<p>Staffordshire County Council – SOVII It is noted that there is a strategic objective specifically in relation to Kidsgrove. There does not appear to be a general objective around sustainable travel for other areas within Newcastle under Lyme.</p>	
<p>Waterways should be acknowledged as significant blue/green infrastructure. The waterway also forms part of the historic environment.</p>	
<p>Staffordshire & Stoke-on-Trent City Council Integrated Care Board - Whilst it is appreciated that the Local Plan is supported by an Infrastructure Delivery Plan, the desire to ensure that critical infrastructure elements are both resilient and adaptable could feature within the overarching objectives.</p>	
<p>Staffordshire Police – SO-III - It is recommended this be amended to 'which draw in visitors and create safe vibrant centres. Strategic Objective SO-V - It is recommended this is amended to 'and to provide aspirational housing, which is well designed, safe, secure and adaptable'. A sense of safety and security are integral to sustainable communities.</p>	
<p>Stoke-on-Trent City Council - supportive of the vision, strategic aims and objectives within the draft Plan and the moves to meet the Council's needs within its own boundaries and adding to the range of employment sites within the functional economic market area.</p>	
<p>How will Newcastle and Stoke work collaboratively, to maximise connectivity between North Staffordshire and the HS2 hub at Crewe? Collaborative working between the two local authorities will help to develop greater clarity around future development opportunities and help to attract more inward investment and jobs, into the region. The North Staffordshire conurbation is effectively one economic and social unit and would therefore benefit from the one single coordinated Local Plan.</p>	
<p>SO-I The final phrase "where possible" in relation to sustainable construction and sustainable transport should be deleted. Suggest that 'where possible' be replaced by 'unless demonstrably not possible'.</p>	

SO-I - The Local Plan does not support objectives that support the special character of the local area.	
SO-II - concerned at the regional reference and the implied scale of development of 'growth for the region'.	
SO-III - Agree with reference to more town centre accommodation so that they become a vibrant centre.	
SO –III - The Ironmarket has a particular attractive layout but the whole town is degraded by several empty shops	
SO-IV - the final phrase after the word 'construction' should be deleted.	
SO-IV should be re-written, so that 'greener construction' is always required not just where it is 'viable and deliverable'. The plan should encourage aspiration to best practice construction standards and should include a requirement for maximising the use of recycled materials.	
SO-IV - The objectives show zero commitment to zero carbon	
SO-VI - should be re-worded as follows: [Note: text in brackets to be added] SO-VI Support the vitality of rural villages, preserving and enhancing the special character which is valuable to each local community whilst enabling balanced growth (through site allocations, infill development and the redevelopment of previously developed sites where available) to improve affordability and to provide choice in housing types for local people	
SO-V - do not know what is intended by 'aspirational housing'. If used in the final document, it should be clearly defined.	
SO-VII - concerned at the encouragement of (undefined) 'balanced growth'. This objective could be seen to encourage the development of new housing in and around all villages.	
SO-VIII - The local plan should reflect the outcomes of neighbourhood plans.	
SO-XII - This should stop after the words 'Green Belt'. Reference to exceptional circumstances in the objective should be removed as the Green Belt is protected by national legislation.	

<p>Two additional Strategic Objectives should be added: - SO-X111 - That the vitality of industrial villages should be supported, including their special historic character. SO-X1V - That the outstanding regeneration of redundant housing and commercial building in industrial villages and other brownfields where previous industrial development creating contaminated land which has made development unviable without remediation in the district, should give priority over non-contaminated brownfields.</p>	
<p>A strategic objective should be added to refer to meeting the identified housing (including affordable housing) and employment requirements in the borough.</p>	
<p>The Plan should reflect the fact that it shares a functional economic area with Stoke-on-Trent City Council and therefore should be prepared using a joint approach</p>	
<p>Audley Parish - lack of mention of built heritage or of culture in general</p>	

5. Approach to Policies

Summary of Main Issues Raised	Council Response
<p>Natural England - advise that it would be useful for the plan to include reference to the Guide to assessing development proposals on agricultural land. Soil is a vital resource for society, and policies should minimize disturbance and preserve ecosystem services during construction. These issues are interconnected with other policy areas like renewable energy, climate change, green infrastructure, biodiversity net gain, flood schemes, and development design. The Defra's Code of practice is recommended for sustainable soil use on construction sites.</p>	<p>The Levelling Up and Regeneration Act received Royal Assent on the 26 October 2023. The Act introduces a new category of planning policies (National Development Management Policies). The National Development Management Policies require regulations to be brought into force before they are implemented. The council will review the progress of the introduction of National Development Management Policies, alongside any other material considerations. On the 19 December 2023, the government published a revised National Planning Policy Framework. The implications of changes made through the revised National Planning Policy Framework will be considered during the development of the Final Draft Local Plan</p> <p>The council will review the need for any additional planning policies in the Plan in the light of consultation responses received and any new evidence or change in circumstances.</p>
<p>Staffordshire County Council - The plan should include a policy on parking and cycle standards to ensure safe parking levels within development sites, based on land use and local setting, to protect the highway network from safety issues.</p>	
<p>Support the council's decision to continue plan-making despite consultations and uncertainty. Note the council's intention to include more detailed development management policies, such as self and custom build, community facilities, and amenity, which adds to the plan-making process. The plan should extend the proposed plan period. Cost implications for community facilities and local amenities should also be considered.</p>	
<p>This indicates that the Local Plan focuses on strategic matters and detailed development management will be subject to later stages of the plan.</p>	
<p>Comments regarding the Levelling-Up and Regeneration Bill and potential impact on the Plan.</p>	
<p>Concerns about the impact of inflation on construction, viability and affordability.</p>	
<p>The plan should extend the opportunities for the specific designation of land for Self and Custom House Building (CSB) housing in the proposed area-based planning system, using Design Codes and following the recommendations of the Bacon Review 2012 (included in rep).</p>	

Give the significant shift in demographic spread the council should include specific policies for provide for both small scale (Lifetime homes) and larger scale housing (Retirement village) solutions for older people.

During the plan period, private and public sector finance may be tight and under threat, so land use planning and site allocation decisions should prioritise community gains as a clear part of the allocation process.

6. Planning for Sustainable Development

Summary of Main Issues Raised	Council Response
No mention in the Plan to Biodiversity Net Gain	<p>The First Draft Local Plan in draft policy SE5 ‘Biodiversity and Geodiversity’ references Biodiversity Net Gain. It is noted that since the consultation on the First Draft Plan, there has been some additional information released on Biodiversity Net Gain by Central Government including the confirmation of its legislative introduction in January 2024 for larger development sites and April 2024 for smaller sites. The final proposed policy approach will be reflected in the Final Draft version of the Local Plan.</p> <p>The Local Plan is supported by a suite of evidence-based documents including the consideration of infrastructure through the preparation of an Infrastructure Delivery Plan. The site selection methodology prepared by the council will continue to be implemented and will take account of consultation responses received to the First Draft of the Local Plan.</p>
Change town centre uses into housing proposals	
Welcome commitment to sustainable development which combats climate change and secures carbon reduction.	
Canals fall within the glossary definitions of open space and Green Infrastructure	
Developers should build out what they have permission for already before considering new sites for development.	
Services and facilities are oversubscribed.	
Concerns regarding the infrastructure implications of the Plan	
Objections to the loss of Green Belt and objections to several sites proposed in the Plan.	
United Utilities – need to consider proximity of sites to wastewater treatment works. Reference to agent of change considerations.	

7. Policy PSD1: Overall Development Strategy

Summary of Main Issues Raised	Council Response
<p>Cheshire East Council - it is not specified whether the requirement for one or more strategic employment sites is included in the minimum 69ha employment land or is in addition to it.</p> <p>It will be important for the boroughs housing and economic strategies to align.</p> <p>The implications of the strategic sites could be wide ranging, and there may be a need for further consideration of the alignment between the economic and housing strategies as well as wider commuting/travel to work patterns and transport implications.</p>	<p>The council's evidence for the approach set out in Policy PSD1: Overall Development Strategy is included in the Housing and Economic Needs Assessment (Turley's, 2023). The Housing and Economic Needs Assessment has considered some of the initial outputs from the 2021 Census, where possible, and in line with planning guidance.</p> <p>The council has commissioned consultants Turley's to prepare an update to the 2023 study, informed by consultation responses to the First Draft Local Plan and any new and additional evidence.</p> <p>On the 19 December 2023, the government published a revised National Planning Policy Framework. The implications of changes made through the revised National Planning Policy Framework will be taken into account during the development of the Final Draft Local Plan.</p> <p>The council included three potential strategic locations in the draft Plan. These sites were not proposed as allocations in the draft Plan however views were sought on the principle of allocating strategic sites in the draft Plan and then also on the site options themselves. The council will consider the responses received to both the principle of development and the individual locations including from neighbouring authorities and other prescribed bodies and determine the appropriateness of allocating one or more major employment sites.</p>
<p>Staffordshire Moorlands District Council - Newcastle Borough Council has previously asked if the District Council would be able to accommodate any of your housing requirement within our District and the Council responded saying this would not be feasible at this point in time.</p>	
<p>Stafford Borough Council - Stafford Borough Council is supportive of the vision, strategic objectives and planning for sustainable development. It is useful to provide a place-specific emphasis to provide more clarity associated with the approach for housing delivery and options for employment growth. Following this consultation period, as further evidence is prepared for the Newcastle under Lyme Local Plan, the Borough Council would value future engagement on details. Stafford Borough are unable to accommodate additional housing provision from your area.</p>	
<p>The council should review its targets for new housing in the Borough in the emerging Local Plan, to greater reflect the actual need (both in number and type of dwellings), recognising that the central Government formula only produces a notional starting figure. The review should take into consideration the most up to date population demographics from ONS (Office for National Statistics) (Office for National Statistics) (Office for National Statistics) and others, the various Housing Needs Surveys that have been undertaken throughout the Borough and the various</p>	

<p>Neighbourhood Development Plans within the Borough, as well as accepting the planning constraints imposed by the Green Belt. We believe that the above approach acknowledges the exceptional circumstances that exist including: - falling population, Green Belt, housing supply and delivery, impact on the rural character of the borough and wildlife.</p>	
<p>Local Planning Authorities are required to use the Standard Method to calculate housing requirements in all but exceptional circumstances, contained at paragraph 61 of the National Planning Policy Framework 2021. This method has been criticised from several different quarters: The reduction in population and marginal increase in the numbers of households is exceptional and requires proper research and analysis. The most recent census figures, showing a decrease in the local population, are not being used (0.5% drop in population from 2011 – 2021). There is no justification for an increase in housing or use of the Green Belt.</p>	
<p>The Plan should update its Housing and Economic evidence</p>	
<p>Data on empty homes should be considered.</p>	
<p>The Plan should consider and recognise the role of Newcastle-under-Lyme as part of the wider joint housing and economic area with Stoke-on-Trent. Stoke-on-Trent City Council area includes more brownfield sites.</p>	
<p>Impact of the decision re HS2 on the overall numbers required.</p>	
<p>Concerns over the approach to housing land supply in the Plan. The Plan also needs additional housing evidence on supply including a housing trajectory</p>	
<p>As set out in the NPPF (National Planning Policy Framework) (para 69a) at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or demonstrate strong reasons for not achieving this target.</p>	
<p>The development strategy pursued by the council in previous years has consistently fallen below the Standard Method.</p>	

<p>There is no clear evidence to show how proposed student residential developments will not simply meet the future growth requirements of the University, or how the growth of the University will be met within the Plan Period (including whether this will have an impact on the take up of established residential properties for student use).</p>	
<p>The calculations should include / consider the contribution of windfall sites – not just as a buffer for non-delivery.</p>	
<p>A higher level of growth would support the baseline forecast of jobs growth, as identified by the Housing and Economic Needs Study and Experian (Turley, 2023), and deliver the labour force necessary to support any reasonable level of job growth. It would also allow flexibility to accommodate the identified needs of other authorities, as part of statutory requirements under its Duty-to-Cooperate.</p>	
<p>The ambition to make a success of the local economy, including the growth proposed through both the Keele Deal / Keele Growth Corridor and the Towns Fund will generate housing need above the minimum requirement established through the Standard Method which, combined with limited supply evidenced by past under-delivery, means that housing will continue to become difficult to access and may lead to the need to provide for more homes.</p>	
<p>The overall housing requirement needs to reflect on affordable housing needs in the Borough and whether the overall levels of housing development need to be increased to reflect this. The local affordable housing needs as established through the council's evidence base amounts to a net annual need of 278 affordable homes per annum. This equates to 77.65% of the overall annual housing requirement, which suggests that the overall housing requirement for the Borough may need to be higher.</p>	
<p>The policy does not make adequate provision for elderly residents through older persons accommodation.</p>	

<p>The strategy is unambitious and will neither support the needs of the population nor underpin accelerated job growth in the Borough. The strategy does not support even a baseline forecast of jobs growth, as identified by the Housing and Economic Needs Study and Experian or deliver the labour force necessary to support any reasonable level of job growth. There is a need to align jobs and housing.</p>	
<p>The plan should consider the allocation of 20% of the housing requirement for additional flexibility.</p>	
<p>The number of houses proposed in the Local Plan to be built on green sites in the Borough is disproportionately greater than the number proposed for non-green sites, and this therefore needs to be addressed.</p>	
<p>Plan covers period 2020-2040. We are already mid-2023. Plan due to be accepted end of 2024, so dwellings will have to be built over the remaining 15 years.</p>	
<p>The economic assessment should reflect a longer period (up to 2040) rather than being based on more short-term assessments.</p>	
<p>The draft local plan has no economic strategy. The overall vision refers to jobs but makes no mention of targets of the types of jobs</p>	
<p>The Local Plan also needs to ensure that development is proportionate to the area in which it is proposed</p>	
<p>There is an inadequate explanation of the reduction to 50 hectares for employment uses in criteria 2 of the policy (from 69 hectares) in this document and the evidence base.</p>	
<p>Employment site promoted at White Rock, Chesterton</p>	
<p>Question the justification for strategic employment site justified given the presence of nearby existing employment sites.</p>	
<p>Oppose the development of strategic employment sites in the Green Belt. None pass sustainability tests</p>	
<p>Object to the loss of Green Belt / Greenfield land.</p>	
<p>Brownfield sites should be the priority.</p>	

<p>No need for the larger scale strategic employment sites. No evidence of need for such provision in the Borough.</p>	
<p>If the council goes forward with formally allocating some or all the potential strategic employment sites that have been identified, then there will be a need for a commensurate uplift in the housing requirement to ensure that housing and employment growth is aligned.</p>	
<p>Criteria 4 of the policy needs to be redrafted to reference the role that other windfall development will have in meeting development needs</p>	
<p>Audley Parish - APC notes the growth proposals for housing and employment. It is less clear how this fits in to a wider strategy for regeneration of the wider conurbation. Whilst the Plan relates specifically to the Borough, it is necessary to take a wider view to ensure that regeneration occurs on brownfield site in the wider conurbation, rather than planning for the Borough in isolation, so relying more on greenbelt and greenfield development within the Borough.</p>	
<p>Silverdale Parish – disagree with distribution of development around Keele and Silverdale.</p>	
<p>Keele Parish - It has been suggested that the census fall might be due to 'statistical outliers and/or be the result of the census taking place at a time when students at Keele University were not present'. Whilst measures to control the pandemic may have impacted on the number of students in the area, they were required to complete the census for their term time address.</p>	

8. Policy PSD2: Settlement Hierarchy

Summary of Main Issues Raised	Council Response
<p>Staffordshire County Council - Development proposals should maximise the use of existing resources and infrastructure to allow jobs, homes and other facilities to be located close to each other and be accessible by public transport. Enhancements to Active Travel corridors within the strategic centre and surrounding area should also be encouraged. Opportunities are set out within the Local Cycling and Walking Infrastructure Plan 2021-2031 (LCWIP).</p>	<p>The settlement hierarchy was informed by several evidence base documents including the Rural Area Topic Paper (2021) and Retail and Leisure Study (2019). The settlement hierarchy seeks to group settlements informed by levels of services and facilities etc. Comments on the settlement hierarchy will be reflected upon in preparing the Final Draft of the Local Plan. It should be made clear that the settlement hierarchy is different from the retail hierarchy which is used for the purposes of assessing the suitability or otherwise of retail development schemes. It is the retail hierarchy (policy RET1) that includes reference to Neighbourhood and District Centres.</p> <p>Areas such as Wolstanton, Porthill, Bradwell, Maybank, Chesterton, Silverdale. For the purposes of emerging policy PSD2, these centres would form part of the strategic centre of Newcastle-under-Lyme for the purposes of the First Draft Local Plan.</p>
<p>The Draft Local Plan focuses on growth in the Strategic Centre, Urban Centre and Rural Centres. It does not seem to specifically acknowledge the importance of sustaining and growing the Neighbourhood and District Centres e.g. Wolstanton, Porthill, Bradwell, Maybank, Chesterton, Silverdale or any others referred to in Core Spatial Strategy ASP5. Silverdale and other industrial villages should not be confused with Newcastle under Lyme, which has its origins in the Royal Charter.</p>	
<p>The Local Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas.</p>	
<p>The hierarchy of centres plan is a granting of permission for development to take place even outside any planned or stated boundaries within Parish and Neighbourhood Plans.</p>	
<p>The role of changes in the bus service(s) should be reflected in the settlement hierarchy</p>	
<p>Support for NUL as a strategic centre</p>	
<p>The wording of policy PSD 2 could be amended to make it clear that residential use is supported in the Strategic Centre as set out by policy PSD3</p>	
<p>Support for the designation of Kidsgrove as an urban centre</p>	
<p>Under the urban centre category – it should be made clear that Kidsgrove incorporates Talke and Butt Lane.</p>	

Support for Rural Centres to meet some of the development need within the Borough	
Audley Neighbourhood Plan makes provision for proportionate growth	
The designation of Audley as a rural centre is in direct conflict with strategic location AB2.	
Audley is a ward with a very high level of Green Belt, and this designates its character. It is also composed of many distinct villages that are currently discreet. Any further development will destroy these characteristics and be detrimental to the health and well-being of its parishioners.	
Miles Green should be regarded along with Audley and Bignall End as part of the identified Rural Centre under Policy PSD 2	
Betley & Wrinehill are defined in the Local Plan as a Rural Centre this designation raises concerns as some of the facilities and infrastructure within the Parish are at or close to capacity and there is no scope to expand them.	
The composition uses and economic weight of the University, alongside Keele, create a settlement that is geographically, economically and functionally different from other Rural Centres in the settlement hierarchy.	
Keele Village (and University Hub) has been designated as a Rural Centre. Whilst we are pleased that this could result in protection of the rural and historic character, the village itself contains little in the way of facilities beyond the primary school and pub, all the other necessary facilities for a rural centre being based on the university campus. Outside of university term time this would inevitably result in a reduction of the facilities available, and for elderly residents' facilities available on the university campus are not easily accessible, often requiring a vehicular journey.	
Keele and Keele University can accommodate a greater level of housing growth which will catalyse regional economic growth	
Keele Parish - We note that although no discussions have taken place with Keele Parish Council, Keele Village (and University Hub) has been designated as a Rural Centre.	

<p>In relation to 'Other Settlements and Rural Areas' the Spatial Strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one village</p>	
<p>What is the justification for the scale of development in rural settlements?</p>	
<p>Betley Balterley & Wrinehill Parish Council - as a Rural Centre this designation raises concerns as some of the facilities within the Parish</p>	

9. Policy PSD3: Distribution of Development

Summary of Main Issues Raised	Council Response
<p>Natural England - Development in Betley & Wrinehill will need to ensure that foul and surface water does not impact on the Midland Meres & Mosses - Phase 1/ Betley Mere SSSI (Site of Special Scientific Interest) Loggerheads is close to Burnt Wood SSSI and several areas priority habitat. Any sites coming forward in this area should follow the mitigation hierarchy in line with Policy SE5: Biodiversity and Geodiversity.</p>	<p>The Local Plan reflects work in testing and refining several spatial options. The distribution of planned growth set out in the First Draft Local Plan (in Policy PSD3) is currently the preferred spatial option. The policy will be reviewed in the light of consultation responses and new evidence.</p>
<p>Historic England - When considering the most appropriate locations for development we urge you to consider how the historic environment may be impacted by the location of proposals. The SEA (Strategic Environmental Assessment) process ensures that reasonable alternative sites are considered so that the harm to heritage can be avoided / minimised.</p>	<p>Draft policy PSD3, in the supporting information referred to a public appeal at Baldwins Gate (reference 21/01041/OUT). This application was granted planning permission on appeal. The outcomes of this appeal and other relevant commitments and completions will be reflected in the preparation of the Final Draft of the Local Plan.</p>
<p>Maer and Aston Parish Council - Maer and Aston Parish Council disagrees with the target figure of 500 additional homes for the Loggerheads rural centre</p>	
<p>Policy wording should refer to a minimum rather than 'in the order of'</p>	
<p>Betley Balterley & Wrinehill Parish Council - as a Rural Centre this designation raises concerns as some of the facilities within the Parish</p>	
<p>Propose that the wording should be changed from '...in the order of...' to '...no more than....'</p>	
<p>The Borough approach ignores the reality that the housing market is wider than the borough boundaries.</p>	
<p>Support for the largest proportion of identified need being directed to Newcastle-under-Lyme, in line with its role as the Strategic Centre at the top of the settlement hierarchy.</p>	
<p>Silverdale – concerns over the density of development and associated implications.</p>	
<p>Silverdale – local infrastructure cannot sustain the amount of development proposed. The size of the new community is beyond the capacity of Silverdale to integrate the emerging communities</p>	

Scale of development directed to Keele / Silverdale is a concern.	
Silverdale - It could be argued that this section is misleading as it suggests that the bulk of the new homes (4,800) will be in the strategic centre of Newcastle, which would support the vision of brownfield development and urban development of the town centre. However, it can only be assumed that this number includes 1,214 houses planned within the parish of Silverdale, as it is no longer designated as a separate district centre.	
Only 900 homes are proposed for urban centre (Kidsgrove), which is too low based on the evidence. Policy PSD2 recognises that Kidsgrove benefits from services and facilities and Kidsgrove railway station	
The policy wording should clarify that Talke forms part of Kidsgrove for the purposes of this policy. Concern over the level of development proposed for Talke / Kidsgrove.	
It does not appear that the approach advocated by Policy PSD 2 has been followed through in Policy PSD 3 in respect of distributing development to Rural Centres in an evidence-based way	
The Borough Council should look again at the impact that new homes would have on the rural centres listed in the document (infrastructure, local countryside and wildlife).	
Any uplift in housing should be directed to the rural centres.	
Audley – level of development proposed does not preserve the rural nature of villages. Concerns over impact on local highways and infrastructure.	
The proposed site allocations, when considered alongside commitments and completions exceed the number proposed in the spatial distribution policy for Audley.	
Audley – several site promoters support the level of development proposed Audley and the figure could be uplifted further.	

<p>Madeley – concerns over the existing infrastructure the village have and any ability to accommodate any further development.</p>	
<p>It is unclear how the 200-home guide requirement was determined as being the appropriate amount of development for Madeley & Madeley Heath (in addition to Betley & Wrinehill). There is no assessment of local needs across the different rural centres, nor might an assessment of what quantum of housing be appropriate in each taking account of constraints and both existing infrastructure provision and future needs.</p>	
<p>Madeley – site promoters are of the view that Madeley and Madeley Heath have the infrastructure required to be a greater focus for new development.</p>	
<p>Loggerheads – concern over the level of infrastructure. The 500 allocated to Loggerheads is too much. Recent expansion of the village has placed a strain on local infrastructure. Concerns over the accessibility to services and facilities in Loggerheads.</p>	
<p>Loggerheads is being asked to provide a disproportionate number of dwellings compared to nearby villages such as Audley and Madeley. This will lead to the urbanisation of the village.</p>	
<p>Loggerheads – site promoters have indicated that in their view Loggerheads is an appropriate area for growth.</p>	
<p>The policy mentions proposals to accommodate development at Keele and Keele University. Keele University has called for better quality homes to be built in the area, which will encourage staff to be based in the local area, reducing the numbers commuting from across the region and beyond.</p>	
<p>The growth of Newcastle-under-Lyme and Keele are complimentary to each other, and this growth is supported as part of the overall distribution of development.</p>	
<p>The identification of Baldwins Gate as a Rural Centre is supported. However, it remains unclear as to why this has not translated to apportionment of homes, unlike other equivalent or less well served Rural Centres which have been apportioned homes within Policy PSD 3.</p>	

<p>The councils Viability Assessment shows that the south of the Borough is more likely to be able to accommodate viable development which includes affordable housing. In addition to this, it is not constrained by Green Belt.</p>	
<p>Baldwins Gate is an area that needs an improvement in infrastructure including bus services.</p>	
<p>The appeal decision at Baldwins Gate for 200 dwellings needs to be reflected in the Plan</p>	
<p>Support for new housing for key workers in the local rural economy Should PSD 3 include an allowance for other rural areas under an additional clause (e)? This should not allow such settlements to atrophy by policies that do not allow any new development. There can be proposals that because of their type and make up will improve the overall sustainability of settlements.</p>	
<p>Keele Parish - It could be argued that this section is rather misleading as it suggests that the bulk of the new homes (4,800) will be in the strategic centre of Newcastle, which would support the vision of brownfield development and urban development of the town centre.</p>	
<p>Recognise that Keele University has called for better quality homes to be built in the area, which will encourage staff to be based in the local area, reducing the numbers commuting from across the region and beyond. Appreciate that this would require some Greenbelt release which is supported subject to requirement that 30% is affordable housing</p>	
<p>Loggerheads Parish Council proposes that instead of the 142 dwellings that the abovementioned sites amount to, Loggerheads Parish will consent to 49 dwellings based on infill of 7 dwellings per year, over the next 7 years. Proposes the wording of '<i>...in the order of...</i>' is changed to '<i>...no more than...</i>'.</p>	
<p>CPRE Staffordshire - We question the justification for the scale of development proposed for allocation in the Rural Settlements.</p>	

10. Policy PSD4: Development Boundaries and the Open Countryside

Summary of Main Issues Raised	Council Response
<p>Historic England - it should be clear that appropriate development is required which protects the significance of heritage assets, including their setting. It may be worth including some additional information about how to deal with development affecting heritage assets within the open countryside, as well as issues relating to historic farmsteads and how to safeguard these assets. It may be worth including some additional information about how to deal with development affecting heritage assets within the open countryside, as well as issues relating to historic farmsteads and how to safeguard these assets.</p>	<p>The council will review the policy wording and approach in the light of consultation responses received. The Local Plan will look to review boundaries at the strategic, urban and rural centres level. The Final Draft Local Plan will also consider the policy approach to village envelopes as included in policy H1 of the 'saved' policies in the Newcastle-under-Lyme Borough Council Local Plan (2003). The approach in the Final Draft Plan will also be informed by extant 'made' Neighbourhood Plans.</p>
<p>Staffordshire County Council – reference should be made to policy IN2 Transport and Accessibility in criteria 4 of PSD4. Para 6.24 - reference should be made to a Town Centre Car Park Rationalisation Strategy to demonstrate no longer a local need.</p>	
<p>The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would therefore not accord with the positive approach to growth required by the Framework. The policy wording as currently drafted only allows for development in a narrow set of circumstances (i.e. replacing existing dwellings, previously developed land, re-use of existing rural buildings etc.) and does not allow for sufficient flexibility to respond to changes of circumstance such as a shortfall in the Councils five-year housing supply position.</p>	
<p>Policy should be reframed to avoid the use of footnotes in the policy.</p>	
<p>Concerned that settlement boundaries can so easily be changed.</p>	
<p>Representations received to change development boundary in various locations</p>	
<p>Representations received to amend village envelope boundary at various locations</p>	
<p>Settlement boundaries should be drawn around proposed allocations and sites that have come forward on countryside location sites in recent years.</p>	

It is essential that this policy is applied to any proposed allocations in the Local Plan	
Support for the Betley and Wrinehill (joint) development boundary in principle.	
Policy is too vague	
Link of policy to the policies map should be made clearer. Policy map is not clear enough	
Danger that the policy approach being more restrictive than Green Belt policy (limited infilling within villages)	
Not clear whether allocated sites in the Local Plan outside development or settlement boundaries will be restricted. Additional clarity on the approach should be added to the supporting text.	
The council policy officers ought to discuss rural policy formulation with their development management team to understand the existing and growing scope and extent of permitted development and prior approval regimes for many rural building and especially agricultural ones (Class Q conversions of barns to dwellings) to promote limited and organic new development in the countryside	
No assessment of small plots and infill sites – for example in Keele.	
Criteria 4 - Self-build should be encouraged as part of allocated sites rather than a policy approach	
Criteria 4b – need to ensure that existing employment sites in the Green Belt can expand.	
Re-building rural buildings (4e) - unclear what 'rebuilding' entails 4f might have the same effect re new for old.	
Criteria 4 (h) on affordable housing / self-build should only apply on land adjacent to an identified settlement rather than in the 'open countryside'	
Criteria 4(h) will help ensure that rural housing needs are met, and rural communities remain sustainable	
Criteria 4 – need to ensure alignment between policy criteria 4 (H) and policy HOU 1.	
Criteria 6 – Importance of agricultural land for crops, animals and food.	

Criteria 6 - recognition should be given that on allocated sites considerations related to agricultural land quality will not apply.	
Para 6.24 - asset rationalisation process will there be the opportunity to consider alternative proposals in addition to windfall housing options and how might infrastructure providers best engage in this process?	
Para 6.25 - more information required as to brownfield sites which have been looked at.	
Staffordshire and Stoke integrated care board - In respect of the car parking provision and asset rationalisation process will there be the opportunity to consider alternative proposals in addition to windfall housing options and how might infrastructure providers best engage in this process?	
Audley Parish Council - We are not sure from the map in the draft Policies Booklet whether the settlement boundaries For Audley and Bignall End have been amended to include the proposed site allocations or whether the site allocations are outside of the boundary.	
Loggerheads Parish Council - is concerned that defined boundaries, which were given effect in 2019 but backdated to 2013, can so easily be changed to accommodate what is the suspected approval of planning application 23/00002/OUT for up to 200 dwellings at Mucklestone Wood Lane.	
CPRE Staffordshire - Is too vague, A clear definition is important here, we think that you are going well beyond national or accepted policy here. There seems to be a direct conflict between Policy HOU1 and PSD4 which needs to be resolved between their respective authors. We think that PSD4 is seriously flawed	

11. Policy PSD5: Green Belt and Safeguarded Land

Summary of Main Issues Raised	Council Response
Representations from the development industry in support of the Keele Inset boundary	<p>The council has prepared / commissioned detailed evidence on Green Belt matters including Green Belt Assessment (parts 1, 2 & 3) and in respect of exceptional circumstances. The council will reflect on the comments made in respect of the overall policy approach and detailed wording in the Final Draft Local Plan.</p> <p>On the 19 December 2023, the government published a revised National Planning Policy Framework. The implications of changes made through the revised National Planning Policy Framework will be taken into account during the development of the Final Draft Local Plan. This will also consider the case for exceptional circumstances justifying changes to existing Green Belt boundaries in the Plan.</p>
Disagree with Keele inset boundary and the basis of the assessment. No local consultation.	
All villages washed over in the Green Belt within the borough should be examined as per Keele.	
Representations from the development industry advancing the inclusion of additional sites to the Plan and amendments to the Green Belt boundary	
The case for exceptional circumstances has not been proven	
Disagree with Green Belt allocations in the Local Plan	
The case for exceptional circumstances has been proven - The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.	
Reduction of Green Belt land is not acceptable. Maintenance of Green Belt land is strongly supported.	
Insufficient Green Belt land is being included as an allocation in the Plan	
Support from the development industry for safeguarding land to respond to future demand. National policy is clear on the need to ensure that Green Belt boundaries will not need to be altered at the end of the plan period (currently 2040).	
Need further reassurance that safeguarded land (if required) is land not allocated for development at the present time.	
Need to ensure alignment between policies PSD 4 and PSD 5.	
Rather than compensation, Green Belt should not be developed on	

<p>Criteria 4 of Policy PSD 5 could be amended as follows: 4. The construction of new buildings within the Green Belt should be regarded as inappropriate, unless it is one for the exceptions listed within national planning policy or for Rural Exception Sites (but excluding Entry Level/First Homes Exceptions Sites) in accordance with Policy HOU 1.</p>	
<p>No consideration has been given to removing other tight knit village envelopes out of the Green Belt that would maximise the use of previously developed brownfield sites currently viable for development and enclosed within a village boundary so no expansion would be incurred, but due to the villages being washed over in Green Belt they are excluded from this plan.</p>	
<p>United Utilities - U UW requests the support of the council for future investment in infrastructure to be able to expediently respond to the infrastructure needs</p> <p>You will need to ensure that your Strategic Flood Risk Assessment identifies any sites that are in a location that is at risk of flooding from a reservoir and ensure that this is considered in your site-specific comments within Chapter 15. U UW can provide this in future</p>	
<p>Betley Balterley & Wrinehill - the Parish Council urges the Borough council to take measures to protect the wider Green Belt across the Borough.</p>	
<p>CPRE Staffordshire - We regret that you have not indicated the settlements for which you intend to prepare boundaries in the Regulation 19 document - and have found no reason for this omission.</p>	
<p>Keele Parish - Statements within this policy appear contradictory as we cannot see how 2a (removal of the Golf Course from the Green Belt) can co-exist with statements 3,4,5 & 6. We strongly object to the removal of Keele Golf course from the Green Belt (SP11 & SP12) and will comment</p>	

on this later in the response under site allocations, along with SP23 and TB19.	
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12. Policy PSD6: Health and Wellbeing

Summary of Main Issues Raised	Council Response
<p>Sport England - For all developments, apply Active Design Guidance 10 principles to create an active environment.</p> <p>Within criterion d also incorporate sports and recreational buildings and land, including playing fields. The addition of the above to criterion d, ensures that the whole spectrum of places to undertake formal and informal physical activity is covered. Sport England also notes the inclusion open spaces identified in the Open Space Strategy though there could spaces which are newly created or unfortunately missed off which should also be covered. A caveat should therefore be included to capture this.</p>	<p>The council will review the policy wording and approach in the light of consultation responses received. This will include ongoing and detailed engagement with Staffordshire County Council regarding the matters raised.</p>
<p>Policy requires more information regarding a mechanism for policy to be achieved (including retrospectively)</p>	
<p>Very limited sports and recreational areas in borough (e.g. Loggerheads)</p>	
<p>Out of town housing developments increase car dependency which increases obesity in the area</p>	
<p>The high number of asthma sufferers may not be due to obesity but because the borough is surrounded by major road networks – M6, A500, A34</p>	
<p>Support the inclusion of a specific policy on health and wellbeing, but we would like to see more specific reference to actions and principles that will support and enable healthier outcomes for residents</p>	
<p>Proper infrastructure such as GP / Dentists for residents of new housing developments have not been mentioned in policy</p>	
<p>Would like to see a much wider scope in the policy, including emphasis on green infrastructure (not just spaces), paths, quality of public realm and support for active travel</p>	
<p>Staffordshire Joint Wellbeing Strategy aims to address the 4 priorities and these benefits come from the Green Belt therefore building should not take place on GB if council prioritises health and wellbeing</p>	

Whole Plan Viability Assessment (April 2023) does not allow for Building for a Healthy Life standard as part of its building costs assumptions.	
We suggest that paragraph 6.31 is currently reads as requiring the provision of new facilities and should be amended to include the improvement of existing accessible routeways such as towpaths.	
There is also opportunity to promote cross border improvements of accessible routes such as towpaths. Working with Cheshire East Council, Shropshire Council and City of Stoke-on-Trent to improve pedestrian and cycle connectivity for communities living close to the borders and seeking sustainable commuting options into the borough or local leisure for residents within the borough for improved health and wellbeing would promote the Vision and Strategic Objectives.	
Policy should be supported by a Health Impact Assessment	
Policy refers to rapid and full HIA – neither are defined in the policy	
Wording of policy unclear	
It would seem unreasonable and disproportionate for a planning application for individual dwelling to have to undertake a full Building for a Healthy Life assessment and indeed it is not designed for such use.	
Staffordshire Police - Fully support requirement for housing developments to achieve Building for a Healthy Life Standard (or as updated). Policy PSD6: Health and Wellbeing 1c “Welcome the reference to ‘safe’ as it relates to walking and cycling. It is the expectation that this would relate as much to the avoidance of opportunities for deliberate harm (and the fear of crime) as it does accidental harm.	
Staffordshire and Stoke on Trent Integrated Care Board - The delivery of more accessible and adaptable dwellings will of course go some way to preventing falls within the home which is a prevalent and often overlooked issue in the over 65 population. Similarly providing minimum standards both internally and externally for all housing will contribute to the prevention of mental health problems and the promotion of recovery as documented within studies	
Duplication of policy with PSD7 - Criteria 1b and 1c would be best incorporated into Policy PSD 7	

<p>Policy appears vague as to what is required to be addressed through health impact assessment</p>	
<p>Do not agree with a separate SPD being drafted as it would leave a policy vacuum.</p>	
<p>Argue that development proposals go against the policy approach set out here.</p>	
<p>Staffordshire County Council - The first sentence begins with 'Supports public health initiatives and encourages healthy lifestyles and environments it is therefore not clear to what the support applies to.</p>	
<p>Staffordshire County Council - i. Subsection a. -We support the intention of including Health Impact Assessments (HIA) with development proposals and would like to discuss with you how this could best be implemented</p>	
<p>Staffordshire County Council - ii. Subsection b. "We support the requirement to meet Building for a Healthy Life Standard in new development. The Plan should also incorporate similar standards for non-residential development, including employment sites.</p>	
<p>Staffordshire County Council - Iii Sub section c. "The intention that development should provide opportunities for healthy living and promote mental wellbeing is supported, and we would also suggest including specific reference "maintain independence" However, in terms of how this is delivered the policy refers to good housing design. It is felt that 'good' in this context is subjective and should be defined more clearly. The Policy here would also benefit from referring to minimum standards agreed by NUL planners, and specifically to key criteria such as development providing access to healthy food growing spaces e.g. regular public transport access, community gardens & orchards and access to/protection of green space more generally.</p>	
<p>Staffordshire County Council - iv. Subsection d. It is not clear how the Plan would define 'unnecessary losses of green space, its implication is that at some point it becomes necessary to lose green spaces for development. The intention to protect green and open spaces is supported but the Policy should be reworded to make that clearer. The</p>	

<p>policy would benefit from more focus on green and blue spaces, acknowledging the health benefits of protecting and enhancing existing spaces as well as promoting the introduction of new green and blue spaces with development.</p>	
<p>Staffordshire County Council - v. Subsection e. "Access to sports facilities and opportunity for recreation and leisure are essential for healthy lifestyles. However, it is not clear what constitutes "appropriate access" as set out in the policy. The Policy would benefit from clarity here about how new development can provide and support access to sport and recreation. We would be keen to see a focus on equity of access (e.g. free/affordable, all age/all ability) for physical activity and sport.</p> <p>vi. Subsection f. We acknowledge the Policy supports schemes that encourage life-long learning and skills training as these will help resident access jobs and improved earnings. We would also welcome specific reference to good jobs and meaningful activity, as these are evidenced to have a positive impact on health and wellbeing. Please also see comments in relation to Employment and Skills Plans in the Employment section of our response.</p>	
<p>Staffordshire County Council - Subsection g. Creating the conditions to help people to make healthy choices that will help adults and children reach a healthy weight is a public health priority, as set out in the Staffordshire Health and Wellbeing Strategy 2022-2027. To deliver this priority, the County Council and partners have implemented an initiative called Better Health Staffordshire. Better Health Staffordshire will address the factors driving excess weight, as well as promote healthy eating and active lifestyles, through the implementation of a whole systems approach (WSA).</p>	
<p>Staffordshire County Council - Sub points i to iii seek to control the opening of new hot food takeaways. This aligns with the healthy and safe communities' Planning Practice Guidance.</p> <p>Subpoint i. seeks to control the opening of takeaways based on their proximity to schools, which is supported in principle. In relation to the distance and time restrictions prescribed we believe these require</p>	

<p>further consideration. The Plan therefore should consider what the issues are around proximity of takeaways to schools and whether differing approaches are justified between primary and secondary.</p> <p>Subpoint ii. seeks to reducing the clustering of hot food takeaways in the town centres of Newcastle and Kidsgrove by setting out that no more than 2 hot food takeaways can be located adjacent to each other. Whilst this may be appropriate for design and place making initiatives its ability to control overall numbers of takeaways is questioned.</p> <p>Subpoint iii. is supported in requiring HIAs (Health Impact Assessments) for all applications for hot food takeaways. With regards to the supporting information in paragraphs 6.31 to 6.44 it is felt that more emphasis and signposting is needed to relevant evidence to support Policy PSD6. Paragraph 6.2 should refer to Borough Council committing to implementing the Better Health Staffordshire initiative and Staffordshire’s “healthy weight” priority via the Staffordshire Health and Wellbeing Board.</p>	
<p>United Utilities - Uuw wishes to note that development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes.</p>	
<p>Audley Parish - would like to see a much wider scope in the policy, including emphasis on green infrastructure (not just spaces), paths, quality of public realm and support for active travel.</p>	
<p>Silverdale Parish - There is evidence of greater health inequalities in Silverdale (AECOM report 2023 Silverdale Parish Council) than found elsewhere in the borough. These health inequalities should be taken into account when decisions are made to allocate land for large housing estates putting additional pressure on health and community services in one ward.</p>	
<p>Loggerheads Parish – policy is currently too vague</p>	

Keele Parish - Some of the Green Belt areas that are included in the allocated sites are close to existing housing settlements and could be developed to provide cycling, walking trails designed specifically to motivate younger adults and children.	
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13. Policy PSD7: Design

Summary of Main Issues Raised	Council Response
<p>Staffordshire County Council - Development proposals should take account of the Staffordshire Residential Design Guide (and any updated version) which provides local guidance on Street and footway layouts for housing layouts. Please note this document is presently under review to ensure greater alignment with the National Model Design Code and Guidance.</p>	<p>The council will review the policy wording and approach in the light of consultation responses received and relevant guidance introduced as a result of revisions to the National Planning Policy Framework published on the 19 December 2023.</p>
<p>The design policy should incorporate the BREAM / Passivehaus standards mentioned in Climate Policy so that these standards are met</p>	
<p>Staffordshire Police - It is recommended that it is amended to read as follows – “Developments should ensure high levels of passive surveillance of streets, spaces and parking, including appropriate lighting, and making sure that the site layout and design minimises opportunities for crime, anti-social behaviour, and minimises the fear of crime. Design should incorporate Secured by Design Principles”.</p>	
<p>Policy PSD 7 refers to new development according with National Design Code, National Design Guide and any local design codes. This creates a potential for conflict between the requirements of codes at a national and local level, as they could contain variations and could therefore be incompatible with one another on specific items.</p>	
<p>There is not a need for smaller developments to undertake a design review not, is there sufficient resources for these to be undertaken by a developer</p>	
<p>National Gas Transmission would like the policy to include “taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.” This is because the increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.</p>	
<p>Criteria 1b and 1c to be included in Policy PSD7</p>	

Design matters may cause unnecessary delay at outline stage, and it may be more appropriate for them to be considered through full applications or reserved matters stages. Evidence that this requirement is needed at this stage?	
Include a definition of the Design Review process within the supporting text and/or the Glossary in Chapter 16.	
Policy PSD 7 would benefit from additional text that directs applicants to a Design Guide or a Design Code prepared in accordance with the principles set out in the National Design Guide	
Often design principles are not fulfilled. Some authorities have designated land for self-builders to encourage diversity of design and innovation	
The idea of placemaking where residents are actively involved in shaping communities where they live sounds good but what about proposed developments active members of communities are against? E.g. SP11	
Historic England - The policy could specifically reference the historic environment and design considerations which may be relevant, including for example in Conservation Areas, as well as reference specific evidence base documents including but not exhaustive to Landscape and Townscape Character Assessments, which will aid prospective developers in understanding what is local character and local distinctiveness.	
Greater emphasis on green design and infrastructure and quality of the public realm, in its own specific clause. Also, more emphasis on pedestrian and cycle connectivity	
The date of the National Design Guide is 2021. The National Model Design Code was a consultation document and is no longer relevant.	
Policy PSD 7 repeats the requirements for housing developments to achieve Building for a Healthy Life standard. This should be addressed either in Policy PSD 6 or Policy PSD 7, not both	
Design principles should encourage use of renewable and low carbon technologies	
Paragraph 6.48 regarding an early-stage design review of large and complex sites should be mandatory rather than just encouraged.	

<p>Part 5 should add that the public realm should be a place where passive surveillance should be promoted. Canal corridors should be included from the outset within the design principles stages and consultation with the Trust should be sought in the early stages to guide development on a case-by-case basis.</p>	
<p>Design In clause 2, massing (d) should be added to (a)</p>	
<p>National Grid - NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.</p> <p>Therefore, to ensure that Design Policy PSD7 is consistent with national policy we would request the inclusion of a policy strand such as: “x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</p>	
<p>Part 5 should add that the public realm should be a place where passive surveillance should be promoted. Canal corridors should be included from the outset within the design principles stages and consultation with the Canal and Rivers Trust should be sought in the early stages to guide development on a case-by-case basis</p>	
<p>Audley Parish - In clause 2, massing (d) should be added to (a). There should be far greater emphasis on green infrastructure and quality of the public realm, in a specific clause. More emphasis could be made of pedestrian and cycle permeability and connectivity. Far greater emphasis should be placed on support for green design. Overall, the design policy lacks ambition. The date of the National Design Guide is 2021. The National Model Design Code was a consultation document and is no longer relevant.</p>	
<p>Silverdale Parish – SP11, 12 and 23 contradict this policy</p>	
<p>Keele Parish - We note that other authorities have designated land for self-builders to encourage diversity of design and innovation.</p>	

14. Climate and Renewable Energy

Summary of Main Issues Raised	Council Response
Building out of town development will increase car travel which will increase fossil fuel usage and air pollution	The council will review the policy wording and approach in the light of consultation responses received. The council has declared a climate emergency and the policy approach within the Local Plan can support many of the ambitions around responding to climate change related matters going forward.
With climate change so important, greenfield sites must be the last feasible option to prevent flooding	
How is NUL ensuring all new housing development are low carbon in line with the UK's net zero strategy	
Council has stated there are 1000 empty homes in Newcastle, refurbishing these will use less carbon and be in keeping with the council's vision of reducing carbon footprint	
Wording needs to be stronger to ensure the policies are seen as obligatory rather than optional.	
It is unclear what the council has done from since it declared a climate emergency regarding sustainable building development.	
United Utilities - currently evaluating all land owned by U UW within local authorities that could be used for renewable energy and developing a list of candidate sites. U UW would welcome discussion with NUL over this	

15. Policy CRE 1: Climate Change

Summary of Main Issues Raised	Council Response
<p>CRE1 refers to many aspects of other national regulations. It is established practice that other regulatory regimes must operate separately to this planning regime. Reference to the Building Regulations should therefore be deleted. Instead, the policy should be amended to add the locational context of Newcastle-Under-Lyme and how this relates to climate change requirements.</p>	<p>The council will review the policy wording and approach in the light of consultation responses received and any other relevant evidence. This will include the relationship of local plan policy with other regulatory regimes including building regulations.</p>
<p>CRE1, 5: related to provision of adequate space for physical protection measures however it is not clear what this requirement is aimed at which will make it challenging for applicants to demonstrate compliance.</p>	
<p>Tree planting measures will take many years to be effective against climate change and therefore does not negate the removal of existing mature trees.</p>	
<p>Reference should be added to walkable neighbourhoods (reducing the need for car use), including mixed use, retention of local facilities, support for home working and ease of pedestrian movement</p>	
<p>Environment Agency - We encourage you to identify climate change as an overall Development Plan priority. Policies within the local plan should align with national net zero targets and mitigation policies. We note the detail within this policy in respect of water efficiency standards but would suggest this be better placed within the Water Resources policy section and be cross referenced here.</p>	
<p>Historic England - We would recommend a clause that considers the role of the historic environment within the climate change agenda and how measures need to be appropriate in the context of the historic environment to protect the significance of heritage assets including their setting, as well as the need to consider appropriate retrofitting of heritage assets. There should be a reference in the reasoned justification to the historic environment and climate change.</p>	
<p>Natural England - Our mapping system shows that the plan area includes areas of peat -a few of these areas are part of RAMSARs, SSSIs or are a</p>	

<p>Site of Biological Importance (SBI) but there are other areas that have no protection at all. Peatlands are our largest natural carbon stores, and it is essential that these are protected and restored where possible. We would advise including within this Policy protection of peat.</p>	
<p>United Utilities - sustainable surface water management should be a critical element of the policy.</p>	
<p>Audley Parish - Reference should be added to walkable neighbourhoods and green materials/ construction</p>	
<p>Silverdale Parish – SP11, 12 and 23 contradict this policy</p>	
<p>Keele Parish - The district heat network at Keele University is currently very limited.</p>	

16. Policy CRE 2: Renewable Energy

Summary of Main Issues Raised	Council Response
<p>The phrase “<i>should provide for at least 10% of their energy needs</i>” should be deleted as it is insufficiently strong and substituted with <i>the phrase “must provide at least 10% of their energy needs”</i>.</p>	<p>The council will review the policy wording and approach in the light of consultation responses received and any changes in national planning policy / guidance.</p>
<p>Staffordshire Police - CRE2, 5: “Associated development and buildings such as access roads, fencing and lighting must be designed to minimise its visual impact whilst ensuring public safety and without compromising site security”. Should be noted in policy that associated development does not compromise site security.</p>	
<p>Scope to ensure solar capture is provided as a condition of building works</p>	
<p>United Utilities - United Utilities is assessing all land within local authorities for renewable energy use and developing a list of potential sites. Aligning site selection with local, regional, and national policies is crucial. As part of preparing a new local plan, we welcome discussing the delivery of renewable energy sites and new opportunities.</p>	
<p>Environment Agency - We welcome the inclusion within the Policy that all major developments should provide for at least 10% of their energy needs from renewable or low carbon energy generation on site unless the applicant can clearly demonstrate that having regard to the type of development and its design, this is not feasible or viable. – However, given the climate crisis, would a more ambitious target be more appropriate?</p>	
<p>Historic England - additional detail will be required in the reasoned justification text and how heritage is being considered in relation to proposals for other types of renewable energy technologies.</p>	
<p>The Canal and Rivers Trust, in our response to the Issues and Options Consultation for this draft plan suggested the inclusion of an Energy Statement with proposals. This would enable the consideration of all potential sources of energy so the selection of the lowest feasible carbon option could be made on a case-by-case basis. The inclusion of the need for Energy Statements would be a useful inclusion within the policy and</p>	

<p>supporting text in providing renewable and zero-carbon sustainable development. This would improve the aspiration of this policy, whilst providing a clear means of achieving the aims of the policy. It would also provide a means of monitoring the success of the percentage aims of the policy and may even allow the percentage to be more aspirational</p>	
<p>Natural England - We advise changing this paragraph to: "Habitats and species of International, National and local importance." In line with paragraph 175 of the National Planning Policy Framework (NPPF)."</p>	
<p>CPRE Staffordshire - It is unclear what the council has done since it declared a climate emergency in 2019</p>	

17. Housing

Summary of Main Issues Raised	Council Response
No need for more houses on the Borough	The council will review the policy wording and approach in the light of consultation responses received. The First Draft Local Plan was supported by detailed evidence including the Housing and Economic Needs Assessment (2023). This considered matters such as the approach to overall housing requirements but also the housing needs of different groups of people / society including the requirement for affordable housing. The council has commissioned evidence in the form of an update to the Housing and Economic Needs Assessment to help inform the council's policy approach in the Regulation 19 version of the Local Plan.
The local plan should help to deliver accommodation for older and disabled people and the specific needs of other groups.	
Should be insisting on Lifetime Homes standard which ensure homes are adaptable and suitable.	
Need to provide a mix of new homes to support local communities	

18. Policy HOU1: Affordable Housing

Summary of Main Issues Raised	Council Response
Direct conflict between HOU 1 and PSD4 which needs to be resolved.	<p>The council will review the policy wording and approach in the light of consultation responses received. The First Draft Local Plan was supported by detailed evidence including the Housing and Economic Needs Assessment (2023). This considered matters such as the approach to overall housing requirements but also the needs of different groups of people / society including the requirement for affordable housing. The council has commissioned evidence in the form of an update to the Housing and Economic Needs Assessment to help inform the council's policy approach in the Regulation 19 version of the Local Plan.</p> <p>The First Draft Local Plan was supported by a viability study (2023). The intention is to update the viability evidence for the regulation 19 version of the Local Plan.</p>
Reference to older persons housing should be made with respect of affordable housing	
The Council should look to provide an element of flexibility in implementing the policy based on prevailing market conditions and site-specific viability considerations.	
Criteria 1 of the policy sets affordable housing percentages. Question whether the percentages identified are realistic and viable.	
The location of the brownfield sites in the high and low value zones should be confirmed to ensure the correct percentage of affordable units is applied, subject to viability.	
The policy should implement a blanket 30% affordable housing policy for all sites across the Borough, unless a site-specific viability appraisal suggests otherwise	
<p>Staffordshire and Stoke integrated care board - The delivery of more accessible and adaptable dwellings will of course go some way to preventing falls within the home and provide a greater degree of independence for an ageing population therefore this approach is supported. Also contributes to the prevention of mental health problems.</p> <p>It is also noted that the policy does not make explicit reference to other forms of supported housing, including housing which meets the needs of people with a learning disability and autistic people. It is recommended this is incorporated at the next stage.</p>	
<p>Broadly supportive of affordable housing percentages</p> <p>A higher percentage of affordable homes is required</p>	
As the population of the Borough is declining and ageing, then affordable housing should provide for single people and couples.	
Question the reduction from 30% to 15% for brownfield sites in low value zone	

<p>Criteria 1a should be amended to indicate a percentage of affordable housing on Green Belt sites</p>	
<p>Criteria 2 of the policy requires the affordable housing to be whatever the Councils Housing Team decide to request. The policy should allow for flexibility and negotiation that reflects the site location and characteristics and not just the most up to date evidence of local housing need.</p>	
<p>Draft Policy HOU1 heavily restricts the delivery of notable affordable housing products, including affordable rent and shared ownership. Reassured to see that Part 2 of Draft Policy HOU 1 does allow for the tenure split to be discussed on a site-by-site basis and be appropriately evidenced to demonstrate local needs.</p>	
<p>Criteria 3 of the policy suggests that on-site affordable housing should be provided. In relation to providing off-site provision, it is unclear how off-site affordable housing could be secured through a planning application and Section 106 agreement relating to a different site, and therefore it is unclear what a developer would need to do to show compliance with the policy. Payment in lieu of affordable housing is the more typical approach to securing funds for affordable housing delivery elsewhere.</p>	
<p>Criteria 3 allows some flexibility concerning off-site affordable provision. The document refers to 'exceptional circumstances. Examples of exceptional circumstances should be provided in the policy.</p>	
<p>Part 4 of Draft Policy HOU1 seeks to secure affordable housing in perpetuity - There is currently nothing in the NPPF (2021), or within Planning Practice Guidance, that requires all affordable housing to be secured in perpetuity. Affordable housing should only be secured in perpetuity on rural exception sites.</p>	
<p>Criteria 6 – not clear what fair dispersal means - A better option would be for policy to refer to the need to balance the needs of registered affordable housing providers to manage tenure and distribution of dwellings against the benefits of pepper potting across the sites.</p>	
<p>Part 7(b) of Draft Policy HOU 1 should allow applicants to demonstrate local affordable housing needs for rural exception sites through sources</p>	

<p>such as the housing register and affordability indicators, in addition to local needs assessments and neighbourhood plan evidence bases which are already listed in the draft policy.</p>	
<p>Criteria 7(c) requires that exception sites only come forward where there are no other suitable and available sites within the Development Boundary of the village or rural centre. This is an unreasonable expectation and would frustrate the delivery of affordable housing.</p>	
<p>Part 7(e) states that an exception site should not exceed a maximum of 1 hectare in line with the definition of a small site. While footnote 7 specifies that in the context of Exception sites, small is defined as a site which should not exceed whichever is the lesser of 5% of the number of dwellings within the main built-up area of the village or 1 hectare, the Draft Local Plan Glossary does not set out what a small site is.</p>	
<p>Clause 7(G) contains too much uncertainty that will hinder the process of delivery. A developer will only undertake a FH scheme if they have available land, a landowner willing to sell at a reduced price and most importantly a strong belief that these homes they pay to build will be sold to a first home buyer. If there is in due course insufficient demand, then any linked S 106 will ensure these homes are then offered to an RSL.</p>	
<p>First Homes (FH) have the benefit for a developer in that they can be administered without the necessary involvement of an RSL, this makes them easier and simpler to administer and deliver. Their protection in perpetuity can be supported by a section 106 undertaking.</p>	
<p>It is assumed from the supporting text the Council intend to apply only the national First Homes eligibility criteria to First Homes within the authority area. This reflects the emphasis on entry-level homes outlined in paragraph 72 of the NPPF and demonstrates the Council's commitment to securing and supporting homes for first time buyers.</p>	
<p>Reference to £250,000 in paragraph 8.2 is not reflective of what a first-time buyer can afford.</p>	
<p>Dispute some of the boundaries for the high value area – for example Clayton, Westlands and Thistleberry should be included.</p>	

<p>Viability assessment does not appear to have tested products for older persons housing, and this should be made clear in the policy.</p>	
<p>If the points being made in the footnotes are substantial enough to need to be referenced in the policy, surely it is substantial enough to be included within the policy itself.</p>	
<p>Lack of emphasis on shared ownership products and social housing for rent.</p>	
<p>No support for a report to be verified by the council's own viability report simply because this ends up with a developer paying twice for reports because the council would require their reports to be paid for by a developer in addition to their own. The paragraph should read: <i>"Where it has been demonstrated with robust justification that the proportion of affordable housing sought would not be viable, the maximum proportion of affordable housing will be sought that does not undermine the development's viability. Financial viability assessments conforming to an agreed methodology from a list of at least 5 agreed assessors prepared by the council will be required. These will be paid for and instructed by applicants."</i></p>	
<p>Audley Parish - emphasise the importance of affordable housing policy being applied consistently through the development management process</p>	
<p>Keele Parish - Should 1a be amended to indicate a percentage of affordable housing on Green Belt sites?</p>	

19. Policy HOU2: Housing Mix, Density and Standards

Summary of Main Issues Raised	Council Response
<p>Staffordshire and Stoke-on-Trent Integrated Care Board - delivering healthcare within settings such as care homes and extra care facilities requires a collaborative approach.</p> <p>To deliver services within concentrated locations there will be, in some cases, the need to consider expansion of primary care estate capacity to accommodate the series of additional roles required to provide the multi-disciplinary team support needed for this service.</p>	<p>The council will review the policy wording and approach in the light of consultation responses received. The First Draft Local Plan was supported by detailed evidence including the Housing and Economic Needs Assessment (2023). This considered matters such as the approach to overall housing requirements but also the needs of different groups of people / society including the requirement for affordable housing. The council has commissioned evidence in the form of an update to the Housing and Economic Needs Assessment to help inform the council's policy approach in the Regulation 19 version of the Local Plan. This will consider matters including housing standards and homes for older people.</p> <p>Additional evidence on housing space standards will be collected for the Regulation 19 version of the Local Plan.</p> <p>The approach in the final draft of the Local Plan will also be informed by revisions made to the National Planning Policy Framework which was published on the 19 December 2023.</p>
<p>Staffordshire and Stoke-on-Trent Integrated Care Board – It is also noted that the policy does not make explicit reference to other forms of supported housing, including housing which meets the needs of people with a learning disability and autistic people. The ICB understands that DLUHC (Department for Levelling Up, Housing and Communities) (Department for Levelling Up, Housing and Communities) (Department for Levelling Up, Housing and Communities) are commissioning independent research to understand the size, cost and demand of this sector with findings due towards the end of 2023. It is recommended that these findings are incorporated within the Plan</p>	
<p>The use of the word 'should' and not 'must' is supported. It provides the flexibility necessary.</p>	
<p>Criteria 1 The Councils approach to optimising densities is discussed in paragraphs 5.11 - 5.15 of the Exceptional Circumstances for Green Belt Release (2023) report.</p> <p>There seems to be a difference in the density being sought and paragraph 5.13 of the Green Belt exceptional circumstances report. Furthermore, this means that more greenfield / Green Belt release will be needed to meet the requirements in the rural areas. Recommend that they are reviewed to ensure that they are appropriate for each area / site, and that the evidential basis is clear.</p>	
<p>Criteria 1 should be amended as follows: 1. Residential development proposals will be expected to achieve the following net densities, unless</p>	

the considerations outlined at criteria 2 indicate that an alternative residential density would be more appropriate	
Criteria 1 - The density formula could work against balanced and diverse new housing across the Borough – different densities in urban and rural areas.	
Criteria 1 - The Local Plan must reassure residents that more housing per hectare will not produce poorly designed, inferior homes and environments	
Criteria 1 - The reference to density requirements in neighbourhood plans is welcomed, but should be amended to refer to densities or 'other design requirements'	
Criteria 1 - the first sentence of criteria 1 should be amended as follows: [Note: text in brackets to be added] 1. Residential development proposals will be expected to achieve the following net densities (unless the considerations outlined at criteria 2 indicate that an alternative residential density would be more appropriate);	
Criteria 1 of this policy is compromised by the loss of the District Centre category - With Silverdale included in the Strategic Centre of Newcastle the proposed development of 40 – 50 dwellings per hectare.	
Criteria 3 - suggested that either criteria 3 is amended to simply require housing mix or be provided in accordance with the latest evidence of need	
Criteria 3 – not clear whether this is a requirement or a guide	
Criteria 3 - Provision needs to be made in an ageing community for Pensioners bungalows	
Criteria 3 - The thresholds as set out regarding tenure mix and percentage of bedroom mix should not be arbitrarily applied. Flexibility will be important in the application of the policy.	
Criteria 3 should be amended to simply require housing mix to be provided in accordance with the latest evidence of need or site-specific considerations / constraints.	

Criteria 3 - Additionally, and instead of the use of the word 'bungalow' can this be replaced with 'housing suitable for older people'. This will allow for lifetime homes.	
Criteria 3 - The market mix tested within the Viability Appraisal differs significantly from that set out in criteria 3	
Criteria 3 requires all major housing development sites to contain a mix of types and sizes including for elderly people. However, this requirement would have implications for smaller development sites of 10 units as such small sites may not be able to deliver elderly accommodation in the form of bungalows etc if there are other design constraints that need to be considered	
Criteria 3 of this policy references the need to consider the specific housing needs of older people. It is unclear what is meant by the wording 'having regard to location and site size' within the policy. Further details and explanation about this should be provided in the supporting text.	
Criteria 3 - The prescribed mix in the policy is unduly restrictive and would prevent the delivery of aspirational houses on smaller sites	
Criteria 3 - The evidence within the HENA supports the decision to have 75-80% of new residential development as houses, with the evidence suggesting a requirement of 76% as houses. However, the HENA caveats this, and states that this data continues to represent only illustrative modelling using available evidence and should not be prescribed as an explicit requirement for all sites given the need to respond to changing market demands, local context and viability factors.	
Criteria 3 - If general density prescriptive requirements are imposed in such matters, and which we consider are best left as general guidance (rather than strict policies!) and the marketplace	
Criteria 4 - National Described Space Standards – should consider transitional arrangements	
Criteria 4 - There are concerns that the blanket application of the NDSS across all residential development, including affordable tenures, will undermine the viability of many development schemes. It is not essential for all dwellings to achieve these standards to provide good quality living.	

For affordable housing, there may be instances where achieving NDSS is impractical and unnecessary.	
Criteria 4 - At present the Draft Local Plan evidence base does not justify the need to apply NDSS across all residential development in the terms of the planning practice guidance – Need, Viability and Timing	
Criteria 4 - We would suggest amendment of clause 4 to refer to 'meet or exceed' Nationally described space standards.	
Criteria 5 - With just 9% of the housing stock in England having basic access features, we know that too many disabled and older people are living in unsuitable housing, which can impact on their ability to live independently. This is why inclusive, accessible homes are a must for everyone	
Criteria 5 - supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Newcastle-under-Lyme	
Criteria 6 requires major developments and specialist housing for older people 10% There may be a need to differentiate between Part a) and part b) of M4(3) technical standards. The glossary may be an appropriate place to set this out as a definition, or it could be appropriately referenced via a footnote.	
Criteria 6 - recommends that 10% of all new homes meet Part M4 (3) Standard (wheelchair user dwelling) irrespective of being major developments or specialist housing	
Criteria 6 of the Draft Policy requires major residential developments and specialist housing for older people to provide 10% of the dwellings as Building Regulations Part M4 (3)(2)(a) wheelchair adaptable dwellings. Opportunity is taken to remind the council of the viability implications of such policies	
Criteria 7 - Amend point 7 Specialist housing for older people or people with special need will be supported provided that: a. (delete) b. It is designed to meet the requirements of residents with a particular focus on social, physical, mental and / or health care needs; and c. The scheme	

<p>has good access to public transport, healthcare, shopping and other community facilities for its residents, their visitors and on-site workers The above amendments would provide a more positive policy support for much needed older persons housing</p>	
<p>Criteria 7 - why is justification required, A developer will only build a costly C2 development for older people if they believe there is a market.</p>	
<p>Policy addition There is growing evidence that many people wish to grow more of their food at home and in a trend for organic food. Modern housing layouts neither provide for allotments to serve their residents or for gardens of sufficient size to allow for more than minimum play and recreation space.</p>	
<p>It is notable that the viability study tested 5 scenarios for residential development. None of these included 1-bed units, nor all of M4(3) dwelling costs. This can all impact on viability.</p>	
<p>The Parish Council at Madeley are concerned to ensure that the relevant housing need is met. The trend within Madeley Parish has been for developments of larger family houses to be constructed and provided for ownership and/or shared ownership schemes in respect of the provision for affordable housing elements. The Parish Council consider that the housing need in the area is for increased availability of social rental properties as families are finding themselves forced to leave the area due to a lack of availability of suitable properties which is detrimental to the development of family units within the Parish boundaries.</p>	
<p>The policy is not clear as to whether sheltered housing and extra care housing would fall into the definition of C2 or C3 or not or whether the Council is supportive of sheltered, extra care as well more specialist older persons housing such as care homes.</p>	
<p>It is unclear what the status of the footnotes are. Any potential for confusion or misunderstanding in policy wording should be avoided.</p>	
<p>Audley Parish - The reference to density requirements in neighbourhood plans (Clause 1) is welcomed but should be amended to refer to densities or 'other design requirements. The reference to neighbourhood plans in clause</p>	

<p>3 is also noted. We would suggest amendment of clause 4 to refer to 'meet or exceed' Nationally described space standards.</p>	
<p>Keele Parish Council - Point 1 of this policy is compromised by the loss of the District Centre category.</p>	
<p>As any development of Keele Golf Course would be a major development can we assume that this policy would result in 40% of the homes being 1-2 bedroomed and 20-25% being bungalows or flats?</p>	
<p>Regarding point 7 we would expect all development in the Borough to be sustainable and therefore provide "good access to public transport, healthcare, shopping..."</p> <p>We would like to know the evidence that will be sought to justify the need for Class C2 accommodation and how "good access to public transport etc" will be assessed.</p>	
<p>Bradwell, Porthill, Maybank and Wolstanton Parish - There is not enough about diversity of house supply (particularly affordable and smaller properties).</p>	

20. Policy HOU 3: Gypsy, Travellers and Travelling Showpeople

Summary of Main Issues Raised	Council Response
Environment Agency - The intentions of this policy may be better delivered through the allocation of specific sites to support the Gypsy/ Traveller communities.	<p>The council prepared evidence in the form of a Gypsy and Traveller Accommodation Assessment and an interim Gypsy and Traveller Interim Site Selection Report (2023) for the First Draft Local Plan. The council will build upon the initial evidence base and inform the council’s policy position in the Regulation 19 version of the Local Plan.</p> <p>The approach in the final draft of the Local Plan will also be informed by revisions made to Planning Policy for Traveller Sites which was published on the 19 December 2023.</p>
Environment Agency - Land use in this respect could be considered highly vulnerable or more vulnerable in terms of its flood risk classification, depending upon the permanent /temporary nature of the associated pitches.	
Environment Agency - Sites should have regard for the protection of groundwater and ensure appropriate provision of utilities and services including foul drainage arrangements to minimise pollution to the water environment and avoid proliferation of non-mains drainage Policy wording section 2.g: “Make provision for waste to be stored appropriately for disposal and be collected in an efficient manner” – this should also include provision for recycling.	
Historic England - welcome the reference to heritage. If the Council decides to allocate sites we will respond specifically at that time.	
Staffordshire Police - It is recommended that reference to the document Places we are proud of A Short Guide to Providing and Managing Sites for Gypsies and Travellers (National Policy Advisory Panel on Gypsy and Traveller Housing, 2021) is included in related documents	
A site already exists at Cemetery Road	
Criteria 1 - note that in 2020, the Borough Council and Stoke City Council conducted an assessment which confirmed that for the period 2020/21 through to 2036/37, 8 permanent pitches would be needed. To date planning permission for 4 pitches has been given, plus approval for 1 other pitch. It is regrettable that the Borough Council is still not able to identify a complete complement of sites and this issue remains outstanding.	
The new local plan should ensure suitable provision for future sites, to prevent future contested planning applications in unsustainable rural locations. Concerned at the rejection of all suggested sites.	

Support future location of traveller sites which are only in sustainable locations - close to public transport, local amenities and urban services.	
The site should be considered for transit provision – reference made to the position in Warrington	
Maer & Aston Parish – Supports that Blackbank cannot be expanded due to location	

21. Employment

Summary of Main Issues Raised	Council Response
<p>Opportunities could exist in utilising warehousing developments to accommodate solar panels, rather than taking up additional land for this purpose</p>	<p>The council will review the policy wording and approach in the light of consultation responses received. The First Draft Local Plan was supported by detailed evidence including the Housing and Economic Needs Assessment (2023). This considered matters such as the approach toward and need for additional employment land in the Borough. The council has commissioned evidence in the form of an update to the Housing and Economic Needs Assessment to help inform the council's policy approach in the Regulation 19 version of the Local Plan.</p>
<p>Historic England - Recommendation made to reference to the role of heritage tourism and how it can be beneficial for economic development as well as to assist in maintaining heritage assets.</p>	
<p>Opposition to the inclusion of strategic employment sites as a component of the overall development strategy (regarding PSD1)</p>	
<p>Inclusion of the strategic employment sites would far exceed the identified hectareage of local need. The availability of existing premises & the scale of proposals and units is also questioned. In-commuting from outside the Borough allied to transport network issues (including road safety, pollution & construction vehicles movements) were highlighted. Impacts on neighbouring housing & existing residents. Infrastructure pressures & loss of countryside. Serve to attract high carbon industries.</p>	
<p>Keele Science Park is regarded as an asset to the Borough & its extension would provide highly skilled jobs, as well as taking advantage of its links to the Borough's strategic core in terms of travel and economic benefits. Opportunities also to create high quality design and satisfy the aspirations of business as well as facilitate high-value economic growth.</p>	
<p>The employment sites in Appendix 2 are welcomed & will allow economic growth in the Borough. The absence of such sites would make the area less desirable, offer few job prospects and not attract outside investors</p>	

22. Policy EMP1: Employment

Summary of Main Issues Raised	Council Response
Perceived vagueness of policy wording leaves the Council vulnerable to inappropriate development.	The council will review the policy wording and approach in the light of consultation responses received. The First Draft Local Plan was supported by detailed evidence including the Housing and Economic Needs Assessment (2023). This considered matters such as the approach toward and need for additional employment land in the Borough. The council has commissioned evidence in the form of an update to the Housing and Economic Needs Assessment to help inform the council’s policy approach in the Regulation 19 version of the Local Plan.
Identifying sites for industrial or commercial development is essential for the Boroughs future prosperity and a mix of sites, differing in size and location, should feature in the Local Plan. New strategic employment sites should avoid a piecemeal or ad hoc approach to development by adopting a masterplan approach, which should be vetted by the Council prior to commencement of any works.	
The area might not be any further advanced industrially/economically than it was ten years ago, under the current Development Plan. Additionally, the work force is heavily weighted in favour of ‘clean’ industries un/semi-skilled industries.	
Provision should be made at the outset for at least two strategic employment sites. With reference to representations made elsewhere, the preferred sites in this regard should be AB2 and KL15	

Employment development more generally should not be on Green Belt land. Significant opposition to development on AB2 for reasons including it is unlikely to generate significant employment for the residents of the borough. The proximity to the M6 with links to Greater Manchester, Cheshire, Merseyside and the West Midlands means it is more likely to pull in a workforce from those areas than from the borough given the limited public transport options. Site will significantly increase the flow of traffic in and around an area that is already regularly problematically congested and has a knock effect to the local roads of the village (Audley). Exceptional circumstances for its development do not exist. Would create low skilled & low paid jobs and the suggested number of roles that would be established is felt to be exaggerated. Automation may take over these roles in the medium term. The challenges of this site as highlighted in the Local Plan Issues & Options are valid. There is not an under-supply of employment land or broader employment issues in the Borough. If HENA implies a need for between 36.5 and 68.8 hectares of employment land, why are strategic options which far exceed these figures being considered? Other development such as Chatterley Valley are already coming forward. Uses would be carbon intensive. Flood risk. Unsustainable location on the edge of the Borough.

Greater recognition should be made of the changes that occurred because of COVID, on home working and the need for very local facilities to support home-based (or partly home-based) workers.

The policy has an urban focus & an additional clause should be added to support agricultural diversification and agri-business. There should also be recognition of the importance of micro and small business development, including creative and knowledge-based activities. Much economic activity is based on SMEs (Small to Medium Enterprise).

<p>Staffordshire County Council - The policy wording should place a greater emphasis on the requirement for high quality sustainable transport connections.</p>	
<p>Staffordshire County Council - No recognition is made of the needs of freight and the requirement for local planning authorities to plan for freight. The site AB2 is for distribution/manufacturing and therefore consideration of adequate lorry parking and welfare facilities will be critical. It is noted that there is a proposal for lorry parking associated to this site within the employment site assessment report, however the policy should contain wording requiring lorry parking/welfare facilities for large employment sites to ensure consistency for future sites/applications that come forward during the plan period.</p>	
<p>Support for the growth ambitions of Keele University, including the extension to the Science Park as referred to via site reference KL13, and the details expressed in the University's Masterplan. It is felt this would bring high skilled jobs and support the Borough's Local Plan strategic objective of growing employment.</p>	
<p>Strategic employment locations (if allocated) are likely to take a significant time to be built out and would not come forward within the period of a referred to business' expansion plans (which would be needed in the very early stage of the Local Plan time horizon). It is considered those strategic sites would be more likely to fulfil a different employment need; relating to more logistical employment uses.</p>	
<p>Whilst there is no objection with a policy which supports the expansion and intensification of existing employment sites, it is considered that in the absence of an allocation for White Rock (area defined on a map) as a designated employment site, this policy would be unsound. Technical reports to highlight the mitigation of ecology and contamination issues on the site are also provided. Arguments made as to open space accessibility improvements & the stance on Green Belt.</p>	
<p>Employment sites in the local area of Audley & Bignall End have been mismanaged previously and these under-utilised areas should be</p>	

<p>revisited in the first instance. Reductions in the population further justify this stance.</p>	
<p>Audley Parish - APC would like to see greater recognition of the changes that occurred as a consequence of COVID, in particular on home working and the need for very local facilities to support home-based (or partly home-based) workers.</p> <p>The policy does have an urban focus. An additional clause should be added to support agricultural diversification and agri-business.</p> <p>There should also be recognition of the importance of micro and small business development, including creative and knowledge-based activities.</p> <p>Much economic activity is based on SMEs.</p>	

23. Retail

Summary of Main Issues Raised	Council Response
<p>Historic England - We recommend including a reference to the role of heritage tourism and how it can be beneficial for economic development as well as to assist in maintaining heritage assets.</p>	<p>The council will review the policy approach toward retail, commerce and retail centres in the light of consultation responses received in preparing the regulation 19 version of the Local Plan and other relevant evidence.</p>
<p>Village retail is a must for elderly people & in reduction of pollution in travelling into town.</p>	
<p>More parking provision is needed for businesses especially if Audley village is to grow further in size.</p>	
<p>Over time, shopping has evolved, with people preferring local supermarkets and internet shopping. Most villages have sufficient shops that are just local small outlets, and this is quite sufficient for most villages in the area.</p>	
<p>The plan should focus on renewing town centres, converting above shops or empty buildings, and reducing antisocial behaviour by incorporating residential areas and improving public transport links.</p>	
<p>Audley Parish – Policy seemingly based on outdated assumptions</p>	

24. Policy RET 1: Retail

Summary of Main Issues Raised	Council Response
The need for more shops is questioned due to the existence of 20-30 vacant shops in Hanley and Newcastle.	The council will review the policy approach in response to the issues raised through the consultation on the First Draft Local Plan. It is intended that evidence on retail boundaries will be prepared to support the proposals contained within the Regulation 19 version of the Local Plan.
Policy not easy to understand for the public.	
Newcastle and Kidsgrove, once popular shopping and coffee spots, require extensive work to revive their vibrancy, attract visitors, and create attractive apartments.	
Concerns on the impact that the Roebuck Centre and Castle Walk have had on the historic town centre.	
No reference to Wolstanton Retail Park and how the Plan would relate to changes to the Retail Park.	
Rural centre car parks are often full. More traffic would make it worse.	
Policy RET1 should acknowledge that there are the bones of a local centre alongside the administrative boundary between the borough and the city of Stoke-on-Trent in Packmoor/ Newchapel. The proposals for Bent Farm include a small parade that would include a convenience store and other small-scale units which would add to this and thus create a Local Centre.	
Concerns that this policy is based on outdated assumptions. Use Class E includes retail but also a range of other uses. There is a current emphasis on diversification of high streets, a better policy heading may be “Town and Village Centres and High Streets”. High Streets rely on a mix of retail, food and drink, recreation, cultural uses, community facilities and other local facilities. Considering the importance of limiting negative impacts from out-of-town retail.	
The council should focus on providing more diverse retail options in Newcastle town centre, addressing vacant shops and stalls. They should oppose the development of new retail areas and preserve existing areas to drive foot traffic, as physical shopping declines due to the pandemic and online retail modernisation.	

The section on retail in PSD 2 is confusing due to the absence of certain facilities for rural retail centres, such as Keele, which lacks the necessary facilities, it is not clear which facilities provided by the University and the village together make it a Rural Centre.

Silverdale, recognised as a Retail District Centre, is consumed in other sections of the plan as part of the Urban Centre.

A consistent settlement hierarchy and allocation are needed for the plan to be fit for purpose. More focus should be placed on urban strategic centre regeneration to encourage retail growth.

Keele Parish - The Role and Tiers in Table 2 do not match those in the settlement hierarchy in PSD 2. Keele is missing altogether in this section, as it obviously does not have the retail facilities needed for a rural retail centre. If this is the case, then it is not clear which facilities provided by the University and the village together make it a Rural Centre.

25. Infrastructure and Transport

Summary of Main Issues Raised	Council Response
<p>Suggestions as to how emissions could be curbed via highways improvements in Kidsgrove. As part of this, electric vehicles can be incredibly supportive to the energy infrastructure in the local area with the progress being made on vehicle to grid technology. Public transport's important role in utilising hybrid & electric technologies is also highlighted, with prospective sanctions for those highly polluting vehicles that remain.</p>	<p>The First Draft Local Plan was informed by transport and infrastructure evidence including the Infrastructure Delivery Plan. The council will update the IDP to inform the proposals included in the Regulation 19 version of the Local Plan.</p> <p>It is intended that additional transport evidence will be commissioned and prepared to inform the policies and approach to allocations in the Regulation 19 version of the Local Plan. This will include a Strategic Transport Assessment.</p>
<p>National Highways -Sites have been identified from the Policies Map that may have the potential to impact the operation of the Strategic Road Network (SRN) in the area. Should any of the sites be allocated in the final Local Plan, further assessment work may be required to ascertain the impact (including the cumulative consequences) on the SRN and to determine the need for mitigation. Recommendation is made that a Strategic Transport Assessment (STA) be produced to support the development of the Local Plan. Allied to this, establishing a Transport Working Group (TWG) to agree the methodology, assessments and infrastructure requirements to aid the plans development & adoption would be beneficial. Engagement with surrounding districts in identifying the most strategic, high-level schemes will be valuable through mechanisms such as Statements of Common Ground.</p>	<p>A level 1 strategic flood risk assessment was prepared in 2019. This document will be updated to inform the regulation 19 version of the Local Plan.</p>
<p>United Utilities - Support is requested of the Council for future investment in infrastructure to be able to expediently respond to the infrastructure needs. Important to ensure that any required upgrades and expansions to protected areas (such as Green Belt & Open Countryside) can be made to meet the infrastructure requirements of proposed future development in the region and future environmental drivers. The Environment Act 2021 places an obligation on sewerage undertakers</p> <p>England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health. Policy wording for this & to provide wider</p>	

<p>support for water and wastewater infrastructure investment that is beneficial to the environment, biodiversity, watercourses and growth is advocated.</p>	
<p>United Utilities - The Strategic Flood Risk Assessment will need to ensure it identifies any sites that are in a location that is at risk of flooding from a reservoir.</p>	
<p>Concerns at the pressures on existing infrastructure, such as highways, public transport & GP services. Individual development needs have not been fully assessed to understand that the relevant infrastructure is available to support them & that it could be viable for existing communities.</p>	
<p>Audley specific issues highlighted include parking difficulties given the narrow streets & traffic issues being exacerbated by the recently reduced public transport services to the village. Over-subscribed schools & at capacity doctors and dentists.</p>	
<p>Newchapel & Mow Cop specific issues (regarding Site Refs NC13 & NC77) include: –Infrastructure including sewage capacity, public transport (including the benefits of improved connectivity to Kidsgrove Railway Station), wider green infrastructure (including carbon capture), traffic & road network repercussions (such as at Pennyfields Road), plus over-subscribed doctors & primary schools. Proposals do not accord with Local Plan policies IN1, IN2 & SE1. Consider development at Talke Pits & only look to bring forward development in is locality once other options have been exhausted.</p>	
<p>Silverdale Parish - Site Allocations for SP11, SP12 and SP23 have considerable implications for infrastructure, and it is difficult to envisage development occurring without major improvements and new roundabouts</p>	

26. Policy IN1: Infrastructure

Summary of Main Issues Raised	Council Response
<p>Recognise the need to secure the funding of infrastructure that is directly related in scale and kind, and which is necessary to make development acceptable in planning terms. However, it is noted that the local healthcare trusts often request contributions towards healthcare provision, however such contributions should be justified and transparent. On this point, the Council should consider recent case law in Worcestershire in formulating a policy for the provision of healthcare contributions and what such contributions should contribute towards, taking account of the statutory framework for funding NHS services. The Council's approach to securing healthcare contributions and what those contributions can be used for should be clearly set out in Local Plan policy so that it is clear and transparent to health care providers, developers, elected Members and residents.</p>	<p>The First Draft Local Plan was informed by transport and infrastructure evidence including the Infrastructure Delivery Plan. The council will update the infrastructure delivery plan to inform the proposals included in the Regulation 19 version of the Local Plan. Additional transport evidence will be prepared to inform the proposals and policy approach included in the Plan.</p>
<p>Audley specific issues highlighted include: Road infrastructure is not suitable for an increase in local & commercial traffic; parking limited with location suggestions for increased provision – will there be measures to mitigate the extra demand?; further EV (Electric Vehicle) charging points required; public transport is very limited – will new development improve this?; greater waiting times & potentially reduced standards for medical services; provisions required from the local authority to reflect an increased population and help guard against issues such as anti-social behaviour worsening; provision for additional pensioner bungalows, the need for improved footpath & road maintenance; brownfield sites should be built on before Green Belt land; capacity at the Severn Trent water treatment plant off Alsager Road; adversely affect flood risk & climate change impacts (exacerbated by the geology of the area and the number of springs); capacity of existing services and where would any new school & medical facilities be located (with reference to para 20 of the NPPF & the proposals for TK30 & CT1)? – will this further impact the Green Belt?; the village needs high-speed broadband; will the electricity supply cope with serving the new dwellings?; appropriate access on to proposed</p>	

<p>residential sites is problematic; cumulative harm with areas such as Red St; harm to wildlife & historic hedgerows; increased pollution & air quality issues; recreational value of sites; who will be employed in AB2 – likely travel from further afield; availability of similar warehouse schemes nearby; low value jobs; amenity impacts with 24 hour operations; capacity of J16, M6 & scope for rat runs through the village; proposals driven by developer aspirations rather than a local need; warehousing unit development does not fit with the wider green agenda.</p>	
<p>Environment Agency - Welcome the detail within this policy that requires development to provide contributions towards or direct provision of flood prevention and surface water drainage. The need is highlighted for new development to contribute toward the upgrade and / or maintenance of existing flood prevention schemes where there is a direct / indirect benefit from these being in place. Financial contributions should also extend toward the running of flood warning and flood alert services.</p>	
<p>Keele & Silverdale specific issues highlighted include Doctor & teacher recruitment could be challenging, even if new facilities are developed. School place availability & getting medical appointments are also concerns. More investment would be required as a minimum, with it essential that the appropriate infrastructure is in place for any development to be successful. The large number of houses currently planned for the former Keele Golf Course and its environs will overload not only the existing transport infrastructure, but also utilities, education and health care. Flooding & nitrate issues. Silverdale has two main roads through the village –i.e. Mill Street/High Street and Newcastle Street/Church Street/Sneyd Terrace. The origins of these roads date from 1850s and have not been widened since and do not have the capacity for widening. The current retail area known as the Parade is already too small (with limited parking) & Silverdale itself is not large enough to cope with development of the scale proposed. What level of disruption can be expected during the building of houses and the necessary infrastructure?</p>	

<p>Transport planning is dependent on historic information covering the period from 2011 and other data for 2016. It is difficult to detect any meaningful comment that explains how infrastructure within the western wards of Keele, Thistleberry and Silverdale will be enhanced to facilitate the growth in population over 2020-40. The Infrastructure Baseline report (2021) mentions, for example, improvement to Silverdale Pumping Station, but for social infrastructure and physical infrastructure there is no detail at the district level. A direct assessment of the implications of the net allocations at Keele, University and Silverdale on traffic flows at A525 and B5368 during the current consultation might alleviate concerns about potential traffic congestion in the future.</p>	
<p>TB19 (Land South of Newcastle Golf Club): Kingsbridge Medical Practice states their own operational situation and the implications of potential development. It is asserted that the Council / Local Plan / Developer / ICB will need to provide full funding for the necessary expansion of the practice because of TB19 being developed. This includes equipment, furnishing and any associated expenses. Recruiting additional staff may be a challenge also. If support for expansion is not provided consideration would be given to moving their practice boundary to exclude the development.</p>	
<p>Loggerheads specific issues highlighted include Limited employment opportunities in the village means significant out-commuting; poor bus services; development in this locality does not align with the transport & accessibility policy of the Local Plan.</p>	
<p>With specific reference to Community Infrastructure Levy (CIL), it is asked that greater consideration is given to ensure that CIL contributions are properly applied to relevant planning applications. Based on the overall scale and scope of development which has taken place within Loggerheads Parish over recent years, what is the threshold for integrating improvements, enhancements and augmentations to infrastructure, amenities, and services? The reference to an existing Infrastructure Delivery Plan (IDP) is noted, but cannot see how this is relevant to Loggerheads Parish or where it has been applied?</p>	

<p>Furthermore, there is not mention within this policy of plans to develop Retail Outlets, sports and recreation facilities, parks and play areas or car parking. A copy of the Infrastructure Delivery Plan, with specific reference to Loggerheads Parish, is requested as soon as practicable.</p>	
<p>This policy will in the future be an important consideration for proposals that could increase the use of facilities or affect assets, in particular parts 4 and 7. These elements of the policy should look to be retained within the final version.</p>	
<p>The document is silent on whether a Community Infrastructure Levy (CIL) is intended (or not intended) to be introduced. No reference is made to HS2 nor is its route reflected on the interactive map.</p>	
<p>Agree with the statement given in paragraph 11.3 that “good infrastructure planning is essential to achieving a high quality of development” and welcome the adoption of an Infrastructure Development Plan. The Local Plan should make it clear that developers will be expected to contribute to the cost of improving or replacing existing infrastructure and enforce the policy through Section 106 agreements.</p>	
<p>No mention of carbon or other emissions anywhere except in the supporting information, which is especially significant given the Council has declared a climate emergency.</p>	
<p>Policy IN 1 does not recognise the role that 100% affordable housing schemes make towards affordable housing provision. There is no scope currently to reduce the level of planning obligations for 100% affordable housing where viability is an issue. There needs to be greater policy direction to allow registered providers to reduce their planning obligations. Further policy criteria & guidance is explicitly highlighted as suggested amendments to address these issues.</p>	
<p>Greater clarity is needed on how the infrastructure pressures will be addressed in practice.</p>	
<p>The level of infrastructure work is needed be calculated before deciding on which sites are the most appropriate (both individually and combined</p>	

<p>when in one settlement/community)? This mismatch will impact on both the viability of any development and on the local community.</p>	
<p>Suggest that in paragraph 4 the reference to 'Health care provision' is linked to the Glossary definition of 'Infrastructure' and expanded upon (within the Glossary) to make clear that health provision extends beyond GP capacity. As of the 1 July 2022 the Staffordshire and Stoke-on-Trent ICS was established and formalised as a legal entity with statutory powers and responsibilities. Statutory ICSs are comprised of two key components: integrated care boards and integrated care partnerships. It should be noted that infrastructural requirements can span across the various partner services, such as primary care networks (including physical and digital infrastructural requirements) and therefore the term health should be understood in this context from both a policy and decision-making perspective.</p>	
<p>CT1 (Land at Red Street and High Carr Farm, Chesterton): Appropriate levels of infrastructure support for a development of the size proposed is going to be impossible, especially in school places and primary healthcare.</p>	
<p>Red Street, Chesterton, Bignall End, Talke and Bradwell specific issues highlighted include in addition to the problem of the full schools in the area, additional houses will place further strains on the other facilities such as doctors, Library and Community Centre. Additional houses will impact adversely on the road system & safety. The roads through the area have road calming measures installed, indicating an already present problem with traffic volume. Increased pollution made worse by removal of hedges and trees which promote Co2 absorption and reduce pollution levels. Concerns as pedestrians have not got access to footpaths and local buses no longer create a network to adjoin the villages.</p>	
<p>Historic England - Would welcome a reference to the historic environment within Clause 4 and how improvements to heritage assets, public realm improvements, local distinctiveness art and interpretation etc. would be beneficial to a local area.</p>	

<p>Whilst 4c mentions drainage, there needs to be a commitment to ensure that where major development sites link to existing drainage that may be inadequate that there is procedure which guarantees funding to improve the existing drainage system. Where relevant, inspection of current drainage will be necessary before planning permission is given for major new housing.</p>	
<p>Kidsgrove specific issues highlighted including making sure that suitable and satisfactory infrastructure is in place for any new housing or business sites, e.g. schools, health and medical services, public transport, well maintained roads, public services.</p>	
<p>Gladman support the policy's intention to secure developer contributions for infrastructure and facilities, subject to viability. Would also welcome an inclusion into the supporting text for negotiation regarding contributions when a development is rendered unviable by a proposed planning obligation. This ensures this policy is not restrictive and has an appropriate level of flexibility to allow sustainable development sites to come forward.</p>	
<p>United Utilities - Any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. The full details of the development proposals are not yet known. For example, the detail of the drainage proposals or the water supply requirements. As a result, it is important to highlight that in the absence of such detail, it cannot be fully concluded the impact on infrastructure over a number of 5-year investment periods and therefore, as more detail becomes available, it may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure. Recommendation is made to include a development management policy with suggested wording to IN1 to this effect, as well as requiring applicants to provide drainage strategies for foul and surface water. For strategic sites, early consideration should be given to the infrastructure strategy as part of the preparation of the local plan and to ensure a co-ordinated approach to delivery.</p>	
<p>Site specific comments to NC13 (Land West of</p>	

<p>Bullockhouse Road, Harriseahead): Infrastructure including sewage capacity, public transport (including the benefits of improved connectivity to Kidsgrove Railway Station), wider green infrastructure (including carbon capture), traffic & road network repercussions (such as at Pennyfields Road). Proposals do not accord with Local Plan policies IN1, IN2 & SE1. Consider development at Talke Pits & only look to bring forward development in this locality once other options have been exhausted.</p>	
<p>Residents concern as to the potential impacts on traffic flows, construction congestion, inconvenience and noise, impact on local services and effects on the natural habitats for wildlife, when there is perceived to be no information to discuss. If site proposals had been provided that show plans for the development site illustrating road layouts, screening proposals, transport link proposals, Section 106 payments (which can be used for improving or preserving local amenities during and following development), actual school placement numbers and provisions to provide these places, alongside the projected increase in footfall to local shops, pubs / restaurants and facilities, then there would be a discussion on the finer points of a plan, less stress for locally affected residents, less stress for councillors faced with irate locals at any consultations and, most likely, a balanced and more contextually objective consultation. This complete contextual and transparent consultation outcome will also provide a comprehensive list of Developer Contributions for a site, or a collection of sites in any affected area, and where the money will be used, again minimising discussions and delays in pre-application advice as well as maintaining transparency and integrity for NULBC and other local authorities. Reference is also made to the perceived deficiencies and ambiguities of the Local Plan evidence base including the Infrastructure Delivery Plan. Implications of the residential & commercial development within Audley are difficult to discern especially for the communities affected. A lack of mitigation & abatement measures including those from the promoters of AB2. The site at AB2 has very limited potential for sustainable transport facilities as</p>	

<p>no bus or train service will invest in new services until a demand has been identified and proven to meet their service provision criteria. The developer of any site should be mandated to provide this information to enhance the consultation with residents of the local area.</p>	
<p>Policy IN1 seems contradictory and not in line with expert thinking on energy efficiency or getting to grips with solutions. Making electricity an all-encompassing fuel resource might not be the answer, given the limitations and capacity of the National Grid. Using up reserve fossil fuels in the short-term is not a sustainable solution either. Until local and national authorities can come to grips with improving public transport, especially in rural areas, people will continue to use their cars.</p>	
<p>The housing shortage is a national problem, which every Council has an obligation to provide a solution to this crisis. The local plan should be robust and have a clear evidence-based indication of how it can provide the housing numbers as required. It may therefore be necessary, as an exceptional circumstance, to utilise part of the greenbelt to fulfil these obligations. Wider points regarding the purpose and review of Green Belt and its merits as a designation are also made. Those areas across the country that are actively farmed should be ring-fenced to protect the future of green spaces and farming industries and to protect the ability to produce the nation's own food sources.</p>	
<p>Natural England - Welcome the inclusion of green infrastructure and biodiversity net gain within this policy and advise that a link is also made to the Nature Recovery Network.</p>	
<p>Loggerheads Parish - With specific reference to Community Infrastructure Levy (CIL), Council asks that greater consideration is given to ensure that CIL contributions are properly applied to relevant planning applications.</p>	
<p>CPRE Staffordshire - The document appears to be silent on whether a Community Infrastructure Levy (CIL) is intended (or not intended) to be introduced.</p>	

27. Policy IN2: Transport and Accessibility

Summary of Main Issues Raised	Council Response
<p>Audley specific issues highlighted include: Provision for additional pensioner bungalows, better village centre parking, the need for improved footpath maintenance, road safety (including for existing residents, pedestrians & cyclists on narrow highways such as Park Lane, Moat Lane and Barthomley Road) and capability to cope with increased traffic levels (what steps will be taken to mitigate this?) including wider accessibility to services & facilities impacts & concerns at reduced public transport availability. Construction traffic & large vehicle movements, (including at M6 & A500 junctions) if AB2 were to be developed. Doctor & dentists at capacity. Greater carbon footprint impacts, pollution, flood risk and climate change issues.</p>	<p>The First Draft Local Plan was informed by transport and infrastructure evidence including the Infrastructure Delivery Plan. The council will update the infrastructure delivery plan to inform the proposals included in the Regulation 19 version of the Local Plan. Additional transport evidence will be prepared to inform the proposals and policy approach included in the Plan.</p>
<p>The emphasis on sustainable and active travel (walking and cycling) is welcomed. A particular concern, however, is over the need for better public transport in rural areas.</p>	
<p>Staffordshire Chambers of Commerce are developing a business case to open a new rail station on the West Coast Mainline at Etruria Valley, close to the new Etruria Valley Link Road, just to the east of the A500 and accessed off Lowfield Drive. The west side of the proposed station would sit inside the boundary of Newcastle under Lyme. We wish to identify this site as an opportunity for a transport hub and associated facilities within the Local Plan. Would welcome collaboration with Stoke with regards to infrastructure to maximise connectivity between North Staffordshire and the HS2 hub at Crewe.</p>	
<p>Loggerheads specific issues highlighted include Limited employment opportunities in the village mean significant out-commuting, with the distance to main centres such as Newcastle & Crewe making travel by car the only option. Very limited public transport options (both in scheduling and places it links to). Very limited local services that are easily accessible and, in many cases, require a car journey. S106 payments for granted planning applications remain outstanding in some cases (with it queried</p>	

<p>as to what the Council will do to address this) and there has been no fresh infrastructure provided to satisfy increased demands from new development and is therefore contradictory to some aspects of this policy. Development in this locality does not align with the transport & accessibility policy of the Local Plan.</p>	
<p>Loggerheads Parish - Council requests detailed information as to how the abovementioned considerations can be retrospectively applied to Loggerheads Parish, and detailed information concerning how these can be implemented for the benefit of Loggerheads Parish going forward.</p>	
<p>With specific reference to LW53, support is given to the aim of this draft Policy, but it is again considered contradictory in terms of its selection as a preferred site and the proposal to expand Loggerheads further by building additional dwellings within the village. It is also pointed out that the draft Integrated Transport Strategy is focused exclusively on the urban core areas of Newcastle and Kidsgrove, has little if any reference to or relevance for rural communities, is now largely out of date (published 2015) and is of itself not consistent with the policy IN2 proposed in the draft plan.</p>	
<p>The Draft Plan proposes to place a significant number of houses in the surrounding locality of Red Street, Chesterton, Bignall End, Talke and Bradwell which all draw on the same road networks & this brings into question road safety (through the narrow roads, absence of pathways for pedestrians & exacerbated existing speeding vehicle issues) as well as flows of traffic onto the A500 & A34, and the limited public transport options.</p>	
<p>National Highways - The points set out in the policy are welcomed and acknowledgement is given that all developments likely to generate significant traffic will be accompanied by a Transport Assessment and a Travel Plan.</p>	
<p>The policy will be an important consideration for proposals that could increase the use of the Canal & River Trust's facilities or affect their assets, in particular parts 6 and 7. Accordingly, they would wish these</p>	

<p>elements of the policy to remain within the final version of the Local Plan.</p>	
<p>Advances in transport technology could influence the sustainability of sites going forward owing to reduced greenhouse gasses & pollution. This should be factored into consideration of development sites.</p>	
<p>The existing road network for commuters from the proposed site CT1 (Red St, Chesterton) is already saturated. The proposed development will simply add to existing congestion, pollution and the use of "rat runs" through surrounding urban areas.</p>	
<p>Position stated that there was nothing to object to in the Local Plan as far as it directly affected the Neighbourhood Plan area. Wider issues such as entry & exit routes to the Chatterley Valley distribution centre, traffic restrictions associated with the Bus gate, air quality management areas, development of sites in Talke, were all highlighted in terms of the desired avoidance of increased vehicle movements in May Bank, Bradwell & Wolstanton. Request also made for further clean air and pedestrian safety measures at Porthill and May Bank.</p>	
<p>Staffordshire Police - Suggested amendments to the policy (Section 4d) & supporting text (Para 11.12) to refer to secure parking for cycles, and safe cycle and footpaths with all routes necessary and serving a specific function or destination.</p>	
<p>Historic England - A clause should be inserted relating to the need to protect and enhance the significance of heritage assets including their setting and how this policy will address transport proposals which have the potential to affect the historic environment. There may also be opportunities through re-routing road networks away from heritage assets or walking and cycling initiatives that could better reveal the significance of heritage assets and these opportunities should be considered.</p>	
<p>HS2 services will feed into Crewe and the importance of employment development land being adequately served by public transport is highlighted. Reference is also made to the Chamber developing a business case to open a new rail station on the West Coast Mainline at</p>	

<p>Etruria Valley, close to the new Etruria Valley Link Road & part of the Centre 500 development. The west side of the proposed station would sit inside the boundary of Newcastle under Lyme. It is also advocated that this site should be identified as an opportunity for a transport hub and associated facilities within the Local Plan. Collaborative working with Stoke City Council to maximise connectivity in North Staffordshire is suggested and reference made to Saved policies from the current development plan & a submitted site location plan in providing further context, background and argument.</p>	
<p>Once further evidence is provided and an assessment is made as part of the next iteration of the Habitats Regulations Assessment (HRA), changes may be required, as the approach to dealing with air quality impacts on European designated sites is progressed.</p>	
<p>Provision of bus services must be an explicit factor in the setting up of new houses & employment development. This should include requirements for some employers to provide or fund a small bus service</p>	
<p>Staffordshire County Council - The policy should place a greater emphasis on sustainability and ensuring that good active travel and public transport links and modes of transport are a priority when looking at new developments and strategic allocations. Various suggested amendments made to Points 1, 3 & 5 of IN2 for added clarity & minimising ambiguity in interpretation.</p>	
<p>Staffordshire and Stoke Intergrated Care Board - Would like to suggest that in paragraph 4 the reference to 'Health care provision' is linked to the Glossary definition of 'Infrastructure' and expanded upon (within the Glossary) to make clear that health provision extends beyond GP capacity. To deliver the joined-up support required to meet the needs of the local population using primary care networks, it should be noted that infrastructural requirements can span across these partner services (including physical and digital infrastructural requirements) and therefore the term health should be understood in this context from both a policy and decision-making perspective.</p>	

<p>Point 1a needs considerable clarification e.g. how will development be located to minimise travel if it is not co-located with employment, what is meant by sustainable modes of transport? Point 2 Keele Parish Council will read with interest any Transport and Travel Assessment plan for development on the former Golf Course (Site ref: SP11) and its environs, as it cannot be seen how the planned scale of development can be achieved without impacting on the safety, capacity, and efficiency of the local road network. The Integrated Transport Strategy and the Staffordshire Bus Service Improvement plan should be included in the evidence base for the Plan, as empirical evidence shows a declining rather than improving service. It would also be helpful if the Plan were to outline how the Borough and/or County propose to encourage more commuters to use the bus and what evidence they might have that such measures would be successful.</p>	
<p>Support for the draft wording of this policy, with it considered that the site of which they have an interest (Land off Birchenwood Way) making use of the existing pedestrian and cycling links on Birchenwood Way, which provide access to the nearby services and facilities in Kidsgrove.</p>	
<p>Whilst the stress placed throughout the draft Plan on the importance of using public transport is welcomed, the document does not pay sufficient attention to the challenge of using public transport</p>	
<p>Under the accessibility heading, the draft document does not refer to parking spaces being reserved for drivers with disabilities.</p>	
<p>The proposed site of NC13 would cause an unacceptable highway safety problem, including the T junction from High Lane to Pennyfields and Chapel Lane.</p>	
<p>Policy IN2 seems contradictory and not in line with expert thinking on energy efficiency or getting to grips with solutions. Making electricity an all-encompassing fuel resource might not be the answer, given the limitations and capacity of the National Grid. Using up reserve fossil fuels in the short-term is not a sustainable solution either.</p>	

<p>Request for detailed information as to how the various considerations highlighted can be retrospectively applied to Loggerheads Parish, and detailed information concerning how these can be implemented for the benefit of Loggerheads Parish going forward.</p>	
<p>Recent developments at Heritage Park, Silverdale, has increased traffic travelling through the village. The road surfaces are of poor quality with little maintenance. Local public transport is limited. Significant problems parking close to GP services, chemist and shopping facilities. Student numbers exacerbate parking problems. Emergency service vehicles at times are obstructed by the number of parked cars etc. Identification of land within the village for additional car parking facilities should be considered. Any development should include up grading the road system throughout the village.</p>	
<p>The council needs to complete a thorough transport assessment of the A500 near to junction 16.</p>	
<p>The promotion of sustainable transport options within Policy IN2 is welcomed. However, the policy could go further and include provision for a sustainable transport hub within the proximity of Keele University to provide a range of transport options to support movement to, from and within the University Growth Corridor. Plans should also take on board the need to create a more accessible and inclusive Public Transport Network, moving away from the East/West lineage of the existing system, and using the Local Plan to open up links to the North and South of Keele University, supporting more circular public transport solutions that link the Urban Villages to core employment sites and amenities, for example the Hospital, and the Keele Campus, ideally opening up public transport access between the A525 and the A53.</p>	
<p>This policy will in the future be an important consideration for proposals that affect the canal and rivers that could increase the use of our facilities or affect our assets, in particular parts 4 and 7. Response from Canal and Rivers Trust.</p>	
<p>Natural England - The Habitats Regulation Assessment (HRA) has identified that air pollution, in particular from traffic, could impact Habitat sites. The</p>	

<p>next stage of the assessment will require further evidence. Once the evidence is provided and an assessment is made, changes may be required as the approach to dealing with air quality impacts on European designated sites is progressed</p>	
<p>Keele Parish - Point 1a needs considerable clarification, how will development be located to minimise travel if it is not co-located with employment, what is meant by sustainable modes of transport? Other than cycling or walking all transport uses some form of power/fuel. Are some considered more sustainable than others?</p> <p>Point 1f appears to be almost wishful thinking when large scale developments are planned, as most households now have 2 vehicles, and this is bound to have significant impact on existing road networks.</p> <p>Point 2 Keele Parish Council will read with interest any Transport and Travel Assessment plan for development on the former Golf Course and its environs, as we cannot see how the planned scale of development can be achieved without impacting on the safety, capacity, and efficiency of the local road network.</p> <p><i>From Newcastle's Integrated Transport strategy 2015: "In the AM peak the reliability of journeys into Newcastle Town Centre along A525 Keele Road has deteriorated from 14% to 24%"</i></p>	
<p>Bradwell, porthill, Maybank and Wolstanton Parish - The Local Plan discusses the importance of public transport yet offers no solutions to the very poor local transport.</p> <p>The Forum also wants to be reassured that the entrance and exit for the Chatterley Valley distribution centre can cope with the staff and vehicle movements. Additionally, the vehicle access arrangements for new sites at Talke on the A14 will not introduce more vehicles in to Brodwell Residential Area or the Wolstanton High Street.</p>	

28. Sustainable Environment

Summary of Main Issues Raised	Council Response
More houses and warehouses should not be placed by villages as people move there for nature, safety, and child-rearing.	The council has declared a climate emergency. The Regulation 19 version of the Local Plan will be supported by a raft of evidence to inform consideration of the topic of sustainable environment.
Concerns as local infrastructure and services are already oversubscribed.	
Local transport needs to improve if residents are expected to reduce car use.	
Clause 12.30. Golf courses should be excluded from this measurement. Golf is an elitist activity that is for private members and should not be counted or considered when calculating public services and green space.	

29. Policy SE1: Pollution, Contamination and Amenity

Summary of Main Issues Raised	Council Response
<p>Environment Agency - Policy SE1 focuses on air quality, but it should equally prioritise protecting groundwater and improving water quality for human health and the environment. It is suggested that separate policies should be created to address specific issues like land contamination, air quality, and water quality, as the current policy headings lack clarity.</p>	<p>The council will consider the comments raised in preparing the next iteration of the Local Plan, the Regulation 19 version of the Local Plan.</p>
<p>Environment Agency - If a development site has potential contamination of soils and groundwater, a Preliminary Risk Assessment is required for any planning application. Developers are advised to follow the Land Contamination Risk Management framework provided in LCRM.</p>	
<p>Environment Agency - Rep contains significant information regarding the Borough's Groundwater & contaminated land situation and history.</p>	
<p>Environment Agency - Consider using the National Quality Mark Scheme for Land Contamination Management to ensure that land contamination risks are appropriately managed. For more information, visit GOV.UK's contaminated land pages, and refer to publications on groundwater protection positions and protection zones (SPZs).</p>	
<p>Environment Agency - To assess risks to controlled waters from a site, refer to the Guiding principles for land contamination. Local authorities can advise on risks to other receptors, such as human health.</p>	
<p>Environment Agency - The following (taken from Wyre Forest DC local plan adopted 2022) is an example of clear and concise policy wording for your consideration. "Development proposals will not be permitted where the land is contaminated (*As defined under Part IIA of the Environmental Protection Act 1990) and not capable of appropriate remediation without compromising development viability or the delivery of sustainable development. For sites where land contamination is suspected, an adequate site investigation survey will need to be prepared (by a competent person) to demonstrate that land contamination issues have been fully addressed or can be addressed through the development".</p>	

Concerns that development at the Keele golf course could exasperate flooding and lead to contamination and pollution due to old mine workings.	
Concerns over increased air pollution due to new developments.	
Canal and Rivers Trust - The Trent & Mersey Canal, located in Kidsgrove Town Centre, is crucial for green and blue infrastructure in the borough. Its Green Flag status highlights the need for protection from development impacts, construction processes, and long-term effects like lighting and water discharges. Policy SE1 addresses these concerns, but there is a need to address the impact of invasive species	
Any development which would result in the loss or deterioration of irreplaceable habitats should be refused? If a habitat is irreplaceable, a compensation strategy would be little recompense.	
What is the definition of "significant"?	
Public transport must improve to make it a viable option. Services have recently been reduced.	
Proposed development especially AB2 will increase air light and noise pollution.	
It is unclear why "amenity" is included in the title, as the policy does not really address amenity.	
CT1 would significantly add to the levels of pollution and remove the "green lung effect provided by the existing land.	
Staffordshire Police - The benefits that external lighting can provide in relation to security and safety is welcomed, although it is recommended that the phraseology is improved. Currently it reads, "Ensure that any proposals where external lighting is required, a lighting scheme will be required for the security and to achieve working activities which are safe". The following would be a better alternative "Ensure that any proposals where external lighting is required, a lighting scheme will be required for security and to promote safe activity".	

<p>Historic England - Under clause 1, we welcome the reference to the historic environment and would request that the wording relates to the significance of heritage assets through its setting. Rather than the current wording, the clause should relate to "heritage assets" rather than "historic buildings" to ensure all types of heritage assets are considered. It will also be relevant under other sections such as noise considerations. The policy should consider all contexts in which there could be an effect for the historic environment.</p>	
<p>Natural England - We welcome this policy but advise that there may be occasions where individual developments will be unable to mitigate for their impacts and a more strategic approach will be more appropriate. For Habitat Sites for example Site Nitrogen Action Plan (SNAP) are sometimes used. Further information can be found here: https://publications.naturalengland.org.uk/publication/6140185886588928</p>	
<p>The opening statement of this section begs the question what level of mitigation would be acceptable, how would the measures be assessed and what type of pollutants will be acceptable?</p>	
<p>Point 1a questions if polluting emissions and odours will be known at development permission granted and if mitigation plans will be effectively implemented, without the Air Quality Action Plans mentioned in Point 1b.</p>	
<p>On Point 2c we would like to highlight that the development of the former Keele Golf Course will do anything but "protect and enhance ecosystems and the green infrastructure network to assist in the absorption of air pollutants"</p>	
<p>Baseline conditions need to be known to measure effectiveness of the policy.</p>	
<p>Silverdale Parish - Development planning on or near land affected by contamination of Walleys Quarry is a much greater issue than given space in the Draft</p>	
<p>Audley Parish - It is unclear why 'amenity' is included in the title, as the policy does not really address amenity. For site AB2, there would clearly be</p>	

<p>difficulties in complying with this policy, due to impacts of light, noise and on-air quality</p>	
<p>Keele Parish - The opening statement of this section begs the question what level of mitigation would be acceptable, how would the measures be assessed and what type of pollutants will be acceptable? Point 1a raises the question of whether polluting emissions and odours will be known at the time of development permission being granted, and whether the proposed mitigation will be effectively implemented e.g. Walley's Quarry. Without the Air Quality Action Plans referred to in Point 1b it is impossible to comment on this. The comments on Point 2 of IN2 apply here with regard to transport, but on Point 2c we would like to highlight that the development of the former Keele Golf Course will do anything but: "Protect and enhance ecosystems and the green infrastructure network to assist in the absorption of air pollutants"</p>	
<p>Bradwell, Porthill, Maybank and Wolstanton Parish - Porthill, Wolstanton and May Bank were designated one of 5 Air Quality Management Areas in the Borough in 2018. The Forum would like to arrange a meeting with the Council's Environmental Health officer and Highways to discuss the latest readings and the need for further clean air and pedestrian safety measures at Porthill and May Bank.</p>	

30. Policy SE2: Flood Risk, Water Resources and Management

Summary of Main Issues Raised	Council Response
Concerns over the impact of new development on flood risk and increased surface water flooding. Issues already exist in some areas.	The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan). The council is intending to update the level 1 Strategic Flood Risk Assessment (from 2019) to inform the proposals and policy approach in the Regulation 19 version of the Local Plan.
Environment Agency - The heading for this policy duplicates elements of Policy SE3 (Water resources). It may be clearer to have separate policies for Flood Risk Management and for Sustainable Drainage.	
Environment Agency - The policy is quite long and seems to duplicate some parts of the NPPF and NPPG guidance. It should have more regard to and focus on specific local Newcastle Under Lyme flood risk requirements linked to your Strategic Flood Risk Assessment (SFRA).	
Environment Agency - The SFRA identifies Lyme Brook as the primary fluvial flood risk in Newcastle Under Lyme, affecting the town centre, including Brook Lane and the Poolfields area, Silverdale, Knutton, Cross Heath, and Clayton. The SFRA identifies some areas as high risk (cumulative impact assessment) Lyme Brook catchment, with some recommendations. You should consider including the SFRA recommendations into your policy.	
Environment Agency - Easement: Recommendation C of the 2019 Level 1 SFRA mandates a minimum 8m development easement near main rivers for essential maintenance access. This requirement applies regardless of floodplain extent. An Environmental Permit is required for development within this 8m strip. If the site is above a culverted main river watercourse, an 8m easement is required, and the area above the culvert is considered a no-build zone.	
Environment Agency - Culverts: Section 4.9.4 of the 2019 level 1 SFRA mandates development efforts to naturalise urban watercourses by reinstating natural channels and restoring floodplains. This will improve biodiversity net gain, amenity, and reduce flood risk. River Basin Management Plans provide detailed information on de-culverting and creating naturalised watercourses.	

<p>Environment Agency - Floodplain compensation: The current section should require the compensation to be level for level and volume for volume. Alternative text below: In accordance with the Level 1 SFRA (10.2.1) applicant must provide level-for-level and volume for volume floodplain compensation, up to the 1% annual probability (1 in 100) flood extent with an appropriate allowance for climate change. Level for Level and volume-for-volume compensation must be undertaken where requested unless a justified reason has been submitted and agreed upon, which may justify other forms of compensation.</p>	
<p>Environment Agency - Modelling: While detailed modelling is a preferred option, we would only normally seek that on major development proposals (for both Main and Ordinary watercourses).</p>	
<p>Environment Agency - Climate Change: Policy text should include an updated allowance for climate change in FRAs, referencing the Gov.uk peak river flow map and climate change allowances. Your surface water section could also link to climate change peak rainfall allowances. Point 2b of the policy is confusing and should be split out to differentiate surface water from fluvial climate change design allowances.</p>	
<p>Environment Agency - Finished Floor Levels: The SFRA advises that as a minimum finished floor levels should be set 600mm above the 1 in 100 years plus climate change (design flood). These could be incorporated into policy.</p>	
<p>Environment Agency - Flood Defence Schemes: The following schemes are under investigation in the area and development contributions are being sought to secure funding for these initiatives.</p> <ul style="list-style-type: none"> • Lyme Brook FRMS Newcastle under Lyme - Environment Agency. • Newcastle under Lyme Drainage Routes Strategy - Staffordshire County Council. <p>The policy should ensure that all development benefiting from flood warning services and flood defences contributes financially to the flood warning service and/or flood defence maintenance. A link to Policy IN 1: Infrastructure could be made. Examples of flood risk management in</p>	

<p>adopted Local Plans can be found e.g. Wyre Forest DC Policy SP.31 – Flood Risk Management.</p>	
<p>Sustainable Drainage - We would look for a commitment for clean roof runoff to be directed away from the sewer system and into infiltration drainage or other SuDS system.</p> <p>We consider any infiltration Sustainable Drainage System (SuDS) greater than 2.0 m below ground level to be a deep system and are not acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. All need to meet the criteria set out here: Groundwater protection position statements - GOV.UK (www.gov.uk).</p> <p>SuDS attenuation basins should normally be located outside of the 1% annual probability fluvial, with climate change, floodplain to avoid operational issues. (e.g. from the system flooding out during a flood event).</p> <p>Environment Agency - You may wish to also consider rural Suds and sedimentation control - to help meet Water Framework Directive objectives please see Rural Sustainable Drainage Systems.</p>	
<p>Historic England - We would welcome the Council considering how the historic environment can be safeguarded within this policy and protection included to ensure that flood alleviation measures do not have a negative effect for the historic environment for example through issues such as waterlogged archaeology.</p>	
<p>Natural England - We welcome this policy but advise that there may be occasions where individual developments will be unable to mitigate for their impacts and a more strategic approach will be more appropriate. For Habitat Sites for example Site Nitrogen Action Plan (SNAP) are sometimes used. Further information can be found here.</p>	
<p>United Utilities - UUW supports Policy SE2's current approach but recommends addressing flood risk and surface water management separately. A separate planning policy for each matter would provide a clear process for new development regarding surface water management.</p>	

<p>United Utilities - We recommend that policy SE2 requires applicants to submit a foul and surface water drainage strategy We wish to recommend the following wording for inclusion as policy in any future local plan: <i>“All applications must be supported by a strategy for foul and surface water management. Surface water should be discharged in the following order of priority:</i></p> <p><i>i. An adequate soakaway or some other form of infiltration system.....”</i></p> <p>[The rep continues to provide more extensive policy and justification text for consideration]</p>	
<p>United Utilities - Flood Risk - UUW emphasises the importance of addressing all forms of flood risk in local plans, approving the current policy wording in Policy SE2. the following additional policy wording / explanatory text is recommended for inclusion as part of Policy SE2:</p> <p><i>“3. Sewer Flood Risk. The risk of flooding from any source must be considered. Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs... [The rep continues to provide more extensive policy and justification text for consideration].</i></p>	
<p>United Utilities - On-site Flood Risk: New development sites should consider existing public sewers at risk of flooding and previous flooding records. Site allocations could be affected by overland flow from public sewers. Early consideration of flood risk in design and development is crucial, ensuring no flood risk is displaced. Our initial assessment of sites identifies:</p> <ul style="list-style-type: none"> - Sites with an on-site modelled flood risk; - Sites with a record of on-site sewer flooding; and - Sites with a record of sewer flooding in the vicinity of the site. <p>Additional policy wording is suggested for each site allocated which is affected by sewer flood risk.</p>	
<p>United Utilities - We are particularly concerned by site reference BL24. Our modelling data identifies a level of flood risk. In the absence of information which confirms that this site is developable either in whole or part, we must register an objection to the allocation of this site.</p>	

<p>United Utilities - Reservoir Flooding: Newcastle-under-Lyme has multiple reservoirs with distinct flooding zones, indicating the extent of potential floodwater spread in the event of a reservoir failure.</p> <p>The Strategic Flood Risk Assessment should identify sites at risk of flooding from reservoirs and include them in site-specific comments in Chapter 15.</p>	
<p>Foul Water and Surface Water - UUW suggests that policy SE2 requires all applications to provide clear evidence of the thorough investigation of the surface water management hierarchy to prevent increased flood risk elsewhere.</p>	
<p>Point 2: Recent record levels of rainfall and flooding suggest that with the changing weather patterns resulting from Climate Change a 1% annual probability of flood does not seem realistic.</p>	
<p>Point 4: Keele Parish Council is concerned re Suds for large scale development projects. For these we consider a hydro-geological study should be undertaken, especially when there will be significant destruction of mature trees, that absorb significant amounts of ground water.</p>	
<p>New housing developments should be strategically located along major routes like the A34 to efficiently manage sewage, rather than in rural areas.</p>	
<p>Keele Parish - Point 2: Recent record levels of rainfall and flooding suggest that with the changing weather patterns resulting from Climate Change a 1% annual probability of flood does not seem realistic.</p> <p>Point 4: Keele Parish Council is concerned re Sustainable Drainage Systems for large scale development projects. For these we consider a hydro-geological study should be undertaken, especially when there will be significant destruction of mature trees, that absorb significant amounts of ground water.</p>	

31. Policy SE3: Water Resources and Water Quality

Summary of Main Issues Raised	Council Response
<p>Environment Agency - Water stress: The Water Cycle Study dated 2020 indicates a moderate stress on water resources within the Borough but suggests that the proposed growth can be managed without resulting in water resource capacity issues.</p> <p>The latest report into Water Stressed Areas (July 2021) indicates the Severn Trent Area to now experience serious water stress. We recommend that further assessment be made to ensure capacity to support the proposed growth. Water stressed areas – 2021 classification - GOV.UK</p> <p>Your policy needs an update to reflect the above.</p>	<p>The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan). The council is intending to update the level 1 Strategic Flood Risk Assessment (from 2019) to inform the proposals and policy approach in the Regulation 19 version of the Local Plan.</p>
<p>Environment Agency - Wastewater infrastructure: Your water cycle study should ensure that your strategic growth can be accommodated in consideration of wastewater infrastructure. To address a constraint in a development, it is crucial to show a solution, whether it is already programmed or a future infrastructure upgrade.</p> <p>WSC recommends a Phase 2 Water Cycle Study for water quality impact assessment, which is not yet part of the Local Plan evidence base, to ensure site appropriateness and deliverability.</p>	
<p>Environment Agency - The EA supports the inclusion of water efficiency standards in Policy CRE 1: Climate change and the tighter requirement for new residential developments to achieve a maximum usage of 110 litres pppd, but suggests it could be better placed within SE3.</p> <p>The tighter water efficiency standards can be justified with reference to the following guidance.</p> <p>Primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:</p> <p>-The Environment Agency publication Water Stressed Areas final classification 2021 -</p> <p>We encourage you to also include policy requirements for grey water recycling and rainwater harvesting for new developments</p>	

<p>Environment Agency -Waste water infrastructure -The water cycle study should consider wastewater infrastructure's capacity to accommodate strategic growth, focusing on local treatment works' ability to accommodate housing and employment growth, addressing physical capacity issues and environmental capacity issues.</p>	
<p>Environment Agency - Water Framework Directive: The Lyme Brook and River Lea, the main rivers affecting the Borough, have poor ecological status. The goal is to achieve 'good ecological status' by 2027, Policy should require development to improve waterbodies' ecological status. Suggested wording provided in the full representation.</p>	
<p>Environment Agency - Supporting Information: Section 12.19 /12.20 – We recommend your plan includes a section on where to find information on specific areas / catchments. Details of the WFD catchment can be found in rep.</p>	
<p>Environment Agency - Non-mains foul drainage: Suggest including text regarding non-mains foul drainage E.g. <i>“Development should follow the hierarchy (order of preference for foul drainage connection), as set out in the National Planning Practice Guidance. The Council requires non mains drainage proposals to assess the potential impacts upon water quality to ensure no detrimental impact on the water environment”</i>. (Wyre Forest adopted local plan).</p>	
<p>United Utilities - Groundwater Source Protection Zones: The Environment Agency has established Groundwater Source Protection Zones (SPZs) for groundwater sources, which are crucial for public drinking water supply. These zones indicate areas with risks from activities on or below the land surface, such as construction. The Uuw strongly prefers development sites to be located away from sensitive groundwater protection areas, such as SPZ1. Clear policy wording is essential to mitigate the effects of development on groundwater environment and public water supply. Uuw welcomes policy SE3: Water Resources and Water Quality but suggests additional wording could be included. [SEE REP FOR WORDING]</p>	

<p>United Utilities - Water Catchment Land: UUW recommends a policy identifying the need to engage with the statutory undertaker for water to determine if development proposals on water catchment land affect water supply resources. For wind energy proposals on water catchment land, applicants should locate development to minimize impact on public water supply through location, risk assessments, and mitigation measures. It is crucial to avoid new wind turbines on deep peat land and ensure that the statutory undertaker is informed about the location of catchment land in the borough. [REP INCLUDES SUGGESTED POLICY WORDING].</p>	
<p>United Utilities - Development next to Wastewater Treatment Works and Pumping Stations: UUW advocates for the identification of new sites, particularly housing, that are not near wastewater treatment works, in line with the NPPF. [ADDITIONAL POLICY WORDING IN REP].</p>	
<p>United Utilities - We wish to highlight that site BL3 (UNPREFFERED) is within proximity of Kidsgrove WwTW.</p>	
<p>Keele Parish - concerned that there is no explicit mention of nitrates and nitrate neutrality in this section</p>	

32. Policy SE4: Open Space, Sports and Leisure Provision

Summary of Main Issues Raised	Council Response
<p>Canal and Rivers Trust - The plan includes our network as open space, aligning with the borough's Vision and Strategic Objectives. Our canals support community health and wellbeing, and we consider parts 1 and 2 of policy SE4 important in future proposals. Cross border connectivity should not be overlooked in our network.</p>	<p>The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan).</p>
<p>Sport England - Sport England welcomes reference to the Council's Playing Pitch Strategy (PPS) and Sport Pitch Calculator to help direct sports provision or contributions towards. However, it is vital that the Council should ensure that the PPS has been kept up to date, in line with Sport England's Playing Pitch Strategy Guidance</p> <p>The policy would be strengthened / be more effective by ensuring that policy states that it relates to open space, sports and recreational buildings and land, including playing fields.</p> <p>It should be noted that not all playing field sites (including lapsed and disused) were captured in the PPS</p>	
<p>The policy is clearly explained apart from point D which is more ambiguous. For example, how would an objective assessment of the quality of any alternative provision be undertaken?</p>	
<p>We hope that the open space off Hoon Avenue, known locally as "Balls/Baldy's Field" will be designated as open land which cannot be developed. This site is ancient farmland and of considerable historic significance.</p>	
<p>Concerns that any major development includes provision of high-quality recreational space.</p>	
<p>Our client has no objection to draft Policy SE 4. 14.2. It is noted that this draft policy emphasises the importance of, and requires, new developments to provide sufficient open space. Therefore, housing allocations in the Local Plan must include sufficient land for open space, it is submitted that some of the land in our client's ownership lends itself to inclusion in the relevant adjoining housing allocations (TK10 and TK27), as open space.</p>	

<p>As off-site open space contributions can often be an issue for affordable housing viability on 100% affordable housing schemes, it is suggested that 100% affordable housing schemes are excluded from this requirement of Policy SE 4.</p>	
<p>The policy should be expanded to address the quality of new facilities and open space provision in development, considering the National Design Guide and current facilities. It should be stronger on protecting facilities in rural areas and settlements.</p>	
<p>Staffordshire County Council - The appropriate location of Sports and Leisure facilities in proximity to the public highway will need to be fully considered and mitigating measures put in place to preserve the safety of the local highway network.</p>	
<p>Specifically on point 2 we would like to see published the criteria that will be used to assess applications and would hope to see that the views of the local community would also be sought, as they are the users of the space.</p>	
<p>The principle of accommodating open space requirements on site for major developments is agreed as part of good design. However, for elements such as provision for children and teenagers, the ability to contribute towards the expansion or improvement of a suitable existing facility should be included within the policy to allow for flexibility.</p>	
<p>The table lists guideline amounts of land per 1000 persons. These values should be increased to encourage Newcastle Under Lyme to be an area renowned for both green space, parks and leisure space which are well maintained.</p>	
<p>If the Council decide to set a minimum size for residential outdoor amenity open space, sports and leisure provision, there should be an exemption for older people's housing schemes so long as high-quality amenity space suitable for older people is provided on site".</p>	
<p>The Council should clarify off-site contributions for neighbourhood-wide facilities, using Sport England Facility Cost Guidance or similar guidance. It should also specify if maintenance costs for the first five years should</p>	

<p>be included, providing developers with greater certainty about the contributions they are likely to be sought.</p>	
<p>Loggerheads Parish Council note that the Draft Local Plan has made no effort to follow these existing designations within existing Neighbourhood Plans:</p> <p><i>'LVV, which is known as 'Land off Market Drayton Road / The Burntwood Community Area</i> is presently subject to legal discussions between the Parish and Borough Councils with respect to its ongoing future, and the intention to have community-based amenities and facilities on the site.</p> <p><i>1V2'</i> is privately owned land, which is designated as open space, with the only other acceptable use being for sports recreation facilities.</p> <p>Council requests the next iteration of the Draft Local Plan demonstrates an emphasis on echoing existing Neighbourhood Plans, many of which have been in place a lot longer than any Boroughwide Local Plan. There needs to be a longer-term plan for locations and infrastructure, and not a piecemeal approach on a site-by-site basis.</p> <p>SO-IX seeks to support the creation, inclusion and enhancement of sports and recreation facilities. The Playing Pitch Strategy and Action Plan, December 2020, stated that the support of strategic partners and key stakeholders would be given to assist the Parish Council in developing a 3g pitch facility. To date, this has not happened.</p>	
<p>Audley Parish - APC would like to see the policy expanded to deal with the quality of provision of new facilities and open space in development. The policy would allow for loss of sports facilities where benefits outweigh loss. This could allow very harmful and unsustainable development, especially in rural areas where there is a greater reliance on car journeys.</p>	
<p>Keele Parish - Specifically on point 2 we would like to see published the criteria that will be used to assess applications and would hope to see that the views of the local community would also be sought, as they are the users of the space.</p>	

33. Policy SE5: Biodiversity and Geodiversity

Summary of Main Issues Raised	Council Response
<p>Environment Agency - We note the inclusion of a minimum 10% increase in BNG (Biodiversity Net Gain) and use of the most up to date metric. Our focus would be on blue infrastructure. We encourage the use of a natural capital approach to prioritise the use of nature-based solutions within all planning applications. We reiterate the importance of integrating green and blue infrastructure.</p> <p>The policy or text could reference the Local Nature Recovery Strategy as a key part of the evidence base.</p>	<p>The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan). The council will also respond to updated guidance and regulations relating to the practice and implementation of Biodiversity Net Gain in the borough.</p>
<p>United Utilities - UUW wish to discuss your approach to BNG delivery and strategic opportunities to support local nature recovery in preparation for your new local plan. Biodiversity measures should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity.</p>	
<p>The policy is welcomed, though it is generic. It would be useful to recognise the role of neighbourhood plans in providing more locally specific policies on bio and geo-diversity.</p>	
<p>The Primary Legislation requiring mandatory Biodiversity Gain becomes effective from September 2023 - although the Environment Act 2021 does not appear to be mentioned at all in your document. The word "should" be used inappropriately in the consultation document despite there being a legal requirement which must be met. This really ought to be made clear in your proposed policy and the information supporting the policy.</p>	
<p>Natural England - We welcome the inclusion of net gain and offer the following suggestions:</p> <p>The use of a map in the plan ensures compliance with national planning policy and effectively demonstrates the relationship between development sites and biodiversity net gain opportunities.</p>	
<p>Natural England - The policy should outline the delivery and management of biodiversity net gain, prioritize habitat creation or enhancement, and the approach to onsite and offsite delivery. Natural England recommends</p>	

<p>on-site provision for delivering gains close to loss areas, while off-site contributions may be necessary due to limitations or to meet biodiversity objectives. Further details could be provided in a supplementary planning document.</p>	
<p>Natural England - Monitoring: The plan should include monitoring requirements for biodiversity net gain, including specific indicators to demonstrate the amount and type of gain provided through development. Local Planning Authorities should collaborate with partners like the Local Environmental Record Centre and wildlife trusts to share data and consider long-term habitat monitoring requirements. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up-front information on monitoring will help to streamline the project stage.</p>	
<p>Natural England - Designated Sites - We advise that the wording of paragraph 3, should be changed and instead of “safeguard and enhanced” the paragraph should state “conserved and enhanced”. We advise that reference should be made to the requirement for a project level Habitats Regulation Assessment (HRA) where a proposal could impact on a Habitats Site(s).</p>	
<p>Natural England - 12.32. This should be amended to “The Borough contains internationally, nationally and locally designated sites important for their biodiversity value.”</p>	
<p>Concerns over loss of biodiversity and habitats due to development of some allocated sites.</p>	
<p>The Local Plan should include a link to the Nature Recovery Network and Local Nature Recovery Strategy, or if Staffordshire LNRS (Local Nature Recovery Strategy) is unavailable for Regulation 19, reference the production timetable for its inclusion.</p>	

Criteria 2 of the policy currently does not reflect how BNG is expected to work in practice. The mitigation hierarchy aims to minimise biodiversity loss, allowing for on-site, off-site, registered, and statutory credit purchases as a last resort. The mandatory implementation of BNG in November 2023 raises concerns about the emerging market for off-site biodiversity provision, potentially leading to increased reliance on statutory credit for development.

The Council must be aware of the launch of Biodiversity Metric 4.0 in March 2023.

It is noted that £600 allowance is made for planning obligations inclusive of a BNG contribution. Page 32 of the Local Plan Viability Study 2023 - HBF would question this figure, as this is an emerging policy area and the market for off-site provision, and statutory credits are not yet known, it is noted that the Viability Appraisal allows £3500 for section 106 contributions per plot inclusive of £600 for BNG costs. Clearly this figure will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available.

There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment, some of which are unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery. An update to the Viability Assessment will be needed to accompany the Reg 19 consultation.

The Metric already accommodates the distance from the development site for proposed off-site BNG units. However, introducing a more rigorous sequential test could add unnecessary financial burden to development and contradict PPG (Planning Practice Guidance), as it is already accounted for within the Metric.

The policy also removes the ability for BNG to be delivered in the NCA or for a developer to be able to use national statutory credits.

<p>Unless the Council have an active strategy for delivering BNG within the Borough the requirement is unreasonable and contrary to national requirements and legislation. The Council should therefore remove the requirement and instead rely on national policy. Recommendation: Amend Policy SE1 point 2 as follows: 2. <i>Major development should calculate biodiversity net gain using the most up-to-date version of the Biodiversity Metric calculation. For minor developments, the latest small sites metric (or equivalent) should be used to calculate net gain.</i> Note: It is recommended to delete the rest of the text - from 'Biodiversity net gain' to 'Borough boundary'.</p>	
<p>Audley Parish – Policy is fairly generic, would be useful to recognise the role of NPs</p>	
<p>CPRE Staffordshire - The word 'should' is used inappropriately in the consultation document despite there being a legal requirement which must be met.</p>	

34. Policy SE6: Historic Environment

Summary of Main Issues Raised	Council Response
Concerns over the impact of development on the historic environment.	The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan).
Canal and Rivers Trust - As drafted this policy currently appears to lack any borough specific aspirations for the protection and enhancement of the historic environment sought through the majority of the plan's Strategic Objectives. This policy could be expanded to better reflect the plan's Vision for the borough.	
The policy should be revised to make it clear that any application which results in the loss of or substantial harm to a Grade II listed building, monument, battlefield, park, or garden will not be approved.	
The Wedgwood Monument at Red Street is a scheduled monument, which should continue to be protected.	
For clarity, and consistency with the NPPF, point 2 of Policy SE 6 Historic Environment should use the wording “appropriate or proportionate to” rather than “suitable to”.	
<p>Historic England- We have further requested that appropriate Heritage Impact Assessment (HIA) is undertaken to ensure that the most suitable sites are brought forward which do not harm the significance of heritage assets. Where harm is identified we would expect the Plan to set out what avoidance/ mitigation measures are available to overcome the identified harm.</p> <p>Qualified and appropriate professionals should undertake the heritage assessments. Are there other relevant documents that can be listed here such as Conservation Area Appraisals and Management Plans, Historic Townscape, Landscape Character Assessments.</p> <p>Amend ‘registered historic parks and gardens’ to ‘registered parks and gardens’ and amend ‘scheduled ancient monuments’ to scheduled monuments.</p>	
Audley Parish – Policy is generic and could focus more on specific heritage assets in the borough	

Keele Parish - We would like to see some reference to the policy with regard to the Conservation Areas within the Borough, and how development proposals would be assessed.	
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35. Policy SE7: Landscape

Summary of Main Issues Raised	Council Response
<p>Historic England - The policy should reference historic landscape. Consider how the policy will ensure that historic landscapes and heritage features are protected and that opportunities are sought to enhance the historic environment. How have the evidence-based documents referenced been used to understand the impacts of the proposed allocations?</p>	<p>The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan).</p>
<p>Historic England - We would expect to see Heritage Impact Assessment (HIA) or similar, available during this process, prior to the allocation of sites to ensure that the most appropriate sites are put forward for development and that all avoidance and mitigation measures have been considered, that reasonable alternative sites have been considered and that sites are ruled out where there is harm to heritage. Several links are included in the rep to assist in the next iteration of the Local Plan. We can assist the Council in preparing Heritage Impact Assessments methodology and expect evidence in the next Local Plan. However, we cannot comment on proposed site allocations without appropriate evidence.</p>	
<p>United Utilities - Landscaping UUW supports the inclusion of Policy SE7: Landscape. The text emphasises the importance of early evaluation of surface water management opportunities in landscaping works, particularly in relation to the requirement for new streets to be tree-lined, a national policy requirement as stated in paragraph 131 within the National Park Policy. Therefore, the following wording is recommended for inclusion within Policy SE7: "<i>Landscaping proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. Landscaping proposals must evaluate and identify opportunities for sustainable surface water management.</i>"</p>	
<p>United Utilities - We recommend incorporating water re-use in redevelopment proposals, such as grey water recycling, and considering</p>	

<p>the impact on utility services when planting new trees. Planting too close can lead to root ingress, increased drainage system failure, and flood risk.</p>	
<p>United Utilities - It will be important that applicants refer to our “Standard Conditions for Works Adjacent to Pipelines” and consult with us when implementing the delivery of landscaping proposals.</p>	
<p>United Utilities - Planting should consider proximity to existing or proposed utility assets to avoid root ingress and avoid planting trees directly over water/ wastewater assets or during tree removal.</p>	
<p>We are supportive of Policy SE7, we see the landscape at Bent Farm as important in helping to create an appropriate design response, and thus enhancing the scheme.</p>	
<p>Neighbourhood plans could provide more localised landscape policies, focusing on designated /valuable landscapes within the area</p>	
<p>The policy is generic. It would be useful to recognise the role of neighbourhood plans in providing more locally specific policies on bio and geo-diversity.</p>	
<p>We agree in principle but would not wish to see "pastiche" development preferred to innovative and sustainable development.</p>	
<p>In subparagraph 3, while the specification of 'native' species is welcomed, referring additionally to species 'of local provenance' would be preferable.</p>	
<p>Audley Parish – Policy is generic and could focus more on specific to the borough</p>	
<p>Keele Parish - would not wish to see "pastiche" development preferred to innovative and sustainable development. Modern design can blend with existing buildings.</p>	

36. Site Allocations

Summary of Main Issues Raised	Council Response
<p>Environment Agency - We have not reviewed all the site allocations. We note however that the list of proposed sites does not fully identify site vulnerabilities in terms of land contamination, ground water vulnerability, proximity to regulated industrial processes / landfill and flood risk from unmodelled watercourses and recommend these be clearly identified for transparency. A level 1 SFRA update is recommended to support site selection. We would recommend modelling but acknowledge that in similar circumstances other LPA's have used other methods such as the risk of surface water flooding map, proximity to watercourse/flow, historic flood data and flood risk from other sources to determine risk. The assessment will determine the suitability of each site for development, with appropriate planning policy recommendations. If you wish to discuss further, we can offer a meeting or document review as part of our cost recovery service.</p>	<p>This section should be read alongside the comments on individual sites found later in this consultation report. The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan). The council will also reflect on changes to national planning policy in preparing the Final Draft Local Plan.</p>
<p>Staffordshire and Stoke-on-Trent Integrated Care Board. - The ICB has engaged with the LPA (Local Planning Authority) on the Infrastructure Delivery Plan and site options. The draft plan supports sustainable communities by keeping key infrastructure up with planned growth. The approach for healthcare estate is informed by Strategic Estates Plans for each primary care network and a wider system infrastructure plan covering the SSOT ICS. Further clarity on the emerging strategy will be shared with the planning authority.</p>	
<p>Cycling UK - 1) the local plan should contain a requirement that all future masterplans for site allocations should show how future residents can safely walk or cycle to local facilities and where appropriate provide land and or funding to provide the walking and cycling routes needed. 2) The local plan should contain a commitment to carry out public consultation on the masterplans for site allocations so that local input can help ensure the masterplans provide adequate walking and cycling routes.</p>	

Incentives for converting empty shops into residential accommodation are lacking, despite the potential to boost the town's economy and attract more people to the centre.	
An individual is seeking clarification on the proposed development of land SP5, as they are unsure if this site is being proposed or not, they are requesting clarification as they would provide an objection.	
Given the current climate concerns we should be proposing a total ban on green field developments within the borough.	
Concerns about building on Green Belt land rather than brownfield. Loss of habitat and wildlife in meadows gives great concern to some residents.	
Query that potential allocations consist of 956 over the residual target, including strategic sites it is "around" 1613 over the residual target. This does not include a windfall allowance. In these circumstances we believe that your council is massively over-allocating land for new housing. We ask the council to explain this to the public. CPRE.	
The council's preference for brownfield development is acknowledged, but most proposed housing allocations are on greenfield sites. We request that the number of new homes on brownfield land and greenfield land, as well as the total area of land in the allocations to be placed in a table. The council's ownership interest in one of the proposed sites in the Green Belt is also questioned. CPRE.	
Comment stating that non-preferred site BL3 should be incorporated into Harding's Wood open space area. Justification for this is also given.	
Comments justifying objections to the development of non-preferred sites NC80,81 & 82.	
The draft Local Plan should prioritize identifying land/sites suitable for renewable energy developments and potentially include client's land in Talke, as highlighted in Appendix A. Knights.	
Comments supporting the inclusion of Green Belt site MD12 as an allocation. The rep includes a Masterplan and supporting evidence and provides arguments around housing need and exceptional circumstances.	

<p>Comments supporting the inclusion of Green Belt site AB30, Comment includes details of sites suitability and sustainability, and the agent has attached supporting documents / plans.</p>	
<p>Comments supporting the inclusion of a site at Shralebrook Road, which is currently proposed for inclusion within the village boundary of Halmerend. The agent believes that the omission of the village boundary around the access was in error, and it is requested that the land proposed to provide the access to the site is included as well. The rep includes details of the site history and further information is attached.</p>	
<p>Comments supporting the inclusion of Green Belt site Land at New Farm, Cross Lane, Audley as an allocation. Agent includes details of sites planning history, suitability and sustainability, and supporting documents / plans are attached.</p>	
<p>Promotion of site KL21, including the submission of a detailed Development Statement and Illustrative Masterplan.</p>	
<p>The plan attached to Appendix D suggests a suitable site at Bar Hill in Madeley for housing development, including a few self-build plots, to meet the Borough's housing needs. It is logical given its proximity to the urban edge and large draft site allocation.</p>	
<p>Promote Green Belt land known as White Rock (CFS116), and for it to be allocated for an employment use to expand its business. The rep includes details of the operations, need for the expansion, planning history and suitability of the site. Further information is attached.</p>	
<p>United Utilities - UUW wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation.</p>	
<p>CPRE Staffordshire - By adding all of the proposed housing allocations for in Table 5 we found a total of 'around' 4995. This is 'around' 956 over the residual target.</p>	

37. Approach to Strategic Allocations

Summary of Main Issues Raised	Council Response
Large employment sites in urban areas rather than using Green Belt land / rural land. For example, Lyme Valley Park, Festival Park and Rycroft.	This section should be read alongside the comments on individual sites later in the consultation report. The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan). The council will also reflect on changes to national planning policy in preparing the Final Draft Local Plan.
Stoke-on-Trent City Council - Given shared functional area with Stoke, the council would encourage end uses which provide better quality, higher paid, secure jobs over warehousing development.	
Allocating strategic employment land in Green Belt in contrary to the council's strategic objectives	
The quality of employment these sites offer tends to be of a lower standard when compared to the aspirational rural occupations that the development threatens to displace.	
The sectors described in the proposed sites are increasingly adopting automation and robotics, leading to a decline in the number of available jobs	
Title should be explicit and refer to Strategic employment allocations	
Whether there is a need for strategic housing allocations and Greenbelt release to enable strategic employment allocations	

38. Residential and Employment Allocations

Summary of Main Issues Raised	Council Response
<p>United Utilities - Chapter 15 includes various site-specific requirements. These are not considered to be sufficiently comprehensive to address the matters raised in this representation. The opportunity to liaise with the LPA is requested to ensure that the matters raised are sufficiently identified for further consideration as part of the development of the sites as site specific requirements. In some instances, a recommendation is made that the matters raised are addressed prior to progressing the allocation further as the issues could affect the principle of development. When considering a range of sites to meet development needs through the site selection process, it would be more appropriate to identify new development sites, especially sensitive uses, such as housing, which are not close to a wastewater treatment works. This position is in line with the agent of change principle (para 187 of the NPPF), with it important to define clearly the mitigation being proposed to address any potential significant adverse effects that are identified, alongside any impacts of the site allocation on existing infrastructure provision. Property interests including rights of access and reservoir flooding zones are also highlighted as aspects for the LPA to be conscious of.</p>	<p>This section should be read alongside the comments on individual sites later in the consultation report. The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan). The council will also reflect on changes to national planning policy in preparing the Final Draft Local Plan.</p>
<p>Objection to the omission of the Land at Audley Road, Chesterton, ST5 6BT. The Site comprises two parcels, Part A measures around 0.42 hectares in area and Part B 0.62 hectares. Considered that either the either whole Site or Part A (adjacent to Audley Road) should be allocated for residential development. Part A and Part B have previously been submitted via the Council's Call for Sites process and the 2 parcels are included in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) within site reference number CT25 - Land off Audley Rd, Chesterton, which also includes a larger area of land. Part A adjacent to Audley Road should be included within a redefined development boundary also enclosing the existing housing fronting the road to both the north and south. Part B is to the rear and together the</p>	

<p>two areas total around 1 hectare in extent. Detailed arguments presented to justify its allocation for development taking account of numerous factors such as the existing built form, Green Belt purposes, sustainability factors, timeframes for delivery and the sites physical characteristics, as well as any potential mitigation measures.</p>	
<p>There are some other urban sites which are not identified within the Draft Local Plan which can make a meaningful contribution to affordable housing supply in the Borough. These include regeneration opportunities in terms of replacing moribund accommodation with modern affordable homes that are fit for purpose and built to the latest standards. Reference is made to the current planning status of sites at Cross St, Gloucester Grange & St Luke's close. A commitment is expressed to deliver affordable housing schemes in and around Newcastle-under-Lyme as well as being committed to taking on affordable housing delivered as part of open market schemes.</p>	
<p>An area of land to the west of Newcastle Road, Talke has been proposed (also via a Call for Sites submission) for the purpose of creating electric vehicle charging and related facilities.</p>	
<p>Request to amend the village boundary of Keele to include land adjacent to 3 Highway Lane, Keele, within the village boundary. This would enable this site to be developed for a single self-build family dwelling.</p>	
<p>Land to the rear of the houses numbered 1 to 15 in Slacken Lane and identified in the draft plan of 2018 as BL3 and marked on the new local plan as Harding's Wood, should be included in the Open Space Strategy, in addition to the area behind Millstone Avenue, as both formed the subject of a Village Green application and inquiry. This plot was submitted for consideration for the building of 55 houses in the 2018 Local Plan, and reasons as to why this land was unsuitable were given at the time. It is considered that those reasons have not changed. Detailed presentation of concerns stated covering aspects such as highway access into the site, heritage, amenity, topological issues, loss of mature fields, with associated highways, infrastructure and character & appearance impacts, should development take place. Land at Harding's Wood &</p>	

<p>Millstone Avenue should be retained as open space for the biodiversity they support, and the physical and mental health benefits of the community.</p>	
<p>Staffordshire County Council - Broad support for the need to allocate employment land in Newcastle under Lyme given the shortage in recent years. However, sites that are being considered as strategic allocations in the Local Plan should demonstrate that they are deliverable with the right choice of sustainable transport options. A compelling evidence base should also identify where there is a need for a specific type of employment use subsequently leading to these types of use coming forward and being allocated in the plan. Consideration should be given to clever design which is built around a good sustainable transport system rather than a good highway network. Whilst existing bus services may have some capacity, there is going to be a requirement for additional services. For instance, if there is a proposed link road through to Keele University from site TB19, there could be an opportunity to provide a joined up public transport system which could serve most new sites in and around Keele, thus providing a good sustainable option for residents.</p>	
<p>Objection to the Draft Local Plan and request the removal of the land East & West of Wereton Road, Audley from the Green Belt and the allocation of the site for residential development – the sites having been previously submitted through the Council’s Call for Sites process - SHELAA references AB72 & AB73. Arguments to justify its inclusion in the Local Plan relate to an evaluation of the site against Green Belt purposes, them not being subject to any other statutory or non-statutory designation, relationship to the existing built form, sustainability factors, timeframes for delivery and the sites physical characteristics.</p>	
<p>National Grid Electricity Distribution (Southwest) Plc - In allocating land affected by high voltage power lines, the LPA should consider the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. In light of the above, NGED does not object to the allocation of land upon</p>	

<p>which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan: 1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land. 2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible; 3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above. 4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.</p>	
<p>Object to the land allocations set out in section 15 of the draft plan and request the allocation of the Land adj. Rowley House, Moss Lane, Madeley for residential development. It is considered that the land would form a suitable complementary site (to the existing preferred allocation MD29) that would support delivery of new homes and provide choice in the local housing market. Its reallocation would reflect the need to consider reasonable options and minimise Green Belt release. The detailed characteristics of the site and its surroundings, its suitability for development and its deliverability are considered in more detail, including it providing non-Green Belt land adjacent to a defined rural service centre. Technical matters, such as drainage, are also evaluated further.</p>	
<p>Party with a specified land interest supports the (continued preferred) allocation of the BW1 site for employment purposes.</p>	
<p>Broadly sceptical regarding the scenarios for economic growth (HENA 2023) and note that the scenarios offered by Cambridge Econometrics, Oxford Economics and Experian are divergent. The HENA 2023 update is</p>	

<p>not considered realistic, nor the argument made, that increasing the housing supply will necessarily promote job growth and encourage more people to the area. The right homes to support a potential workforce need to be built in the right place and there is limited evidence that thought has been given to such fine-grained issues.</p>	
<p>A land interest (<i>n.b. not currently stated as a preferred allocation</i>) at Woodside, Baldwins Gate is promoted, the extent of which was also submitted to the Council as part of the Call for Sites exercise that took place in January 2022. Reference is made to the outline planning application submitted by Richborough Estates elsewhere in Baldwin's Gate, related to the erection of up to 200 homes within a community parkland, with the application subsequently allowed at appeal. Aspects of the Inspector's conclusions in upholding the appeal with regards to the settlement's sustainability including public transport provision are also highlighted.</p>	
<p>Once any of the sites are accepted in the Local Plan, the developer will have carte-blanche to build on them. Residents nor councillors will be able to reject the planning applications with regards to these sites. Therefore, development on sites AB2, KL13, KL15, SP11, 12 & 23, TB19, CT1, TK30, BL18, i.e. building on Green Belt land, should be rejected.</p>	
<p>Development should not take place on the former Keele golf course site, owing to loss of green infrastructure, its recreational value and it being in the Green Belt. Existing properties for older people should not be sold off by housing associations owing to the increasing demand for these types of properties, plus their retention reduces the pressure for development elsewhere.</p>	
<p>The Sky Building close to Newcastle town centre and other empty buildings could be put back into circulation, as a priority, to create a substantial amount of accommodation, including for single people.</p>	
<p>Land is being promoted at Madeley Heath (SHELAA ref: MD12 - <i>n.b. not currently stated as a preferred allocation</i>) for around 240 homes (market and affordable) and community uses (potentially new primary school, sports pitches, public open space, and wider greenspace). The Rural</p>	

<p>Centre of Madeley and Madeley Heath (joint) justifies more housing due to its role and infrastructure capacity. In addition, there are concerns about the deliverability of the single preferred site in Madeley (site ref. MD29) due to significant environmental constraints and its failure to prevent urban sprawl. SA (Suitability Appraisal) Section 3 should test a fourth higher housing delivery option in line with the NPPF and PPG to meet the acute affordable housing need for the Borough. SA Section 5 should also test all reasonable growth options available within the Borough. For example, a more positive approach to Green Belt land release around the sustainable Rural Centres (e.g. Madeley & Madeley Heath). Whilst in principle the FDLP correctly acknowledges the need for Green Belt land release to meet housing targets, insufficient Green Belt land is being released. The approach to the distribution of housing is also lacking evidence and fails to recognise the larger role which Madeley and Madeley Heath could play to meet this need, subject to identifying a suitable site allocation. The credentials of the site are highlighted, with suitability, availability and achievability arguments made, allied to consideration of harm to the Green Belt.</p>	
<p>Certainty of delivery of the number of homes needed to meet the Objective Assessed Housing Need is fundamental to the successful implementation of the Local Plan strategy. The supplemental text should be clarified to enshrine this point of principle. Only those sites that have passed the test deliverability should be included in the site allocations list. Site AB12 demonstrably fails this test.</p>	
<p>There is an extremely low level of employment in the Audley area and any jobs that would be on offer through industrial or warehouse areas would not be relevant or benefit the local community. Availability of other brownfield opportunities along the A500. The exceptional circumstances for Green Belt release need to be explained.</p>	
<p>Site specific comments to NC13 (Land West of Bullockhouse Road, HARRISEAHEAD): The council is urged to review its targets for new housing in the Borough to reflect the actual need (both in number and type of dwellings). Reflecting on neighbourhood & Borough specific housing</p>	

<p>needs surveys undertaken allied to the constraints of the Green Belt (& it being developed only in exceptional circumstances). Reductions in population forecasts, the nature & character of the rural settlements, delivery rates of new homes over the last decade should all be factored in. Contradictory to the 2022 SHELAA conclusions. Impacts on nature & wildlife, achieve the opposite of supporting green infrastructure, landscape & carbon footprint, increasing urban sprawl and coalescence of settlements. Brownfield land & empty homes availability. Prime Minister’s recent statements on Green Belt and not concreting over the countryside. Development will conflict with the Local Plans Strategic Objectives and the Newcastle-under-Lyme Council Shared Prosperity Fund including damage to watercourses, natural drainage and loss of greenspace. Mining legacies. Ecological impacts (referred to in a detail following a survey). Infrastructure including sewage capacity, public transport (including the benefits of improved connectivity to Kidsgrove Railway Station), wider green infrastructure (including carbon capture), traffic & road network repercussions (such as at Pennyfields Road). Proposals do not accord with Local Plan policies IN1, IN2 & SE1. Consider development at Talke Pits & only look to bring forward development in this locality once other options have been exhausted.</p>	
<p>Object to the omission of the land at Slacken Lane, Kidsgrove (Ref: BL4) from the list of housing allocations and it being identified instead as a protected open space within the Draft Local Plan. Detailed argument presented elucidating that the extensive technical work that has already been undertaken by & on behalf of those with an interest in the land, confirms that there are no constraints that could not be addressed while bringing the site forward for development. Viability, it being sequentially preferable to other sites, wider existing greenspace provision in the locality, allied to addressing favourably the SHELAA parameters, were also highlighted. Developer ambitions for the site’s development further amplified the arguments for new homes being built within this site.</p>	
<p>There are no allocations currently proposed in Baldwins Gate and this conflicts with the spatial strategy set out in PSD 2 which emphasises the</p>	

<p>role of Rural Centres in meeting the Borough’s housing need. The Rural Area Topic Paper also shows that Baldwins Gate is one of only 2 Rural Centres which meet all sustainability criteria without being considered jointly with a nearby settlement. Taking account of this & other factors, site ref: LW38 should be allocated as a residential development site. The arguments for it being discounted from consideration for allocation based on concerns over access arrangements into the site and the loss of agricultural land are challenged, with reference to the recent appeal decision at Baldwin’s Gate Farm.</p>	
<p>Supports the Local Plan site selection rejection of and agree with the considered reasons for each parcel of land for rejection, of the sites put forward in the Maer & Whitmore Ward: LW6, LW7, LW9, LW38, LW42, LW48, LW78, LW83 & LW84. It is considered that each of the rejected locations lacks facilities and services, lies outside the village envelope and is in an unsustainable location.</p>	
<p>Arguments made which highlighted the merits, mitigation and pitfalls, including design & land-use suggestions, for many sites across the Borough. On a settlement by settlement basis, these include sites in Crackley, CT1 and greenspace & traffic impact aspects; Keele, where it is stated that it is vital that a green woodland area is kept between KL15 and Paris Avenue estate; Holditch, where CT20 is felt to be an appropriate employment site, but as it is clearly visible from Apedale Country Park, it should include trees that screen the buildings to some extent; Knutton, where KS3 should be moved further out along Blackbank road because it currently takes away a field that has been used for recreation.</p>	
<p>Locations of sites NC80, NC81, and NC82 are not suitable for development. Impacts on pedestrians, landscape & traffic (including road capacity and suitability) are highlighted. Similar concerns also expressed to NC13 as Mow Cop Road is used as direct route to the A34 from this location.</p>	
<p>Focus of comments relates to TK10, TK27 and TK17. This argues that specific infrastructure problems/difficulties in relation to these sites the</p>	

<p>proposed additional housing would cause already inadequate roads to become impossibly congested and to deteriorate even further. Connected to this, given that the current schooling and health facilities in the village would not sustain a sudden increase in population, would further development and therefore more land be needed to build more schooling and medical facilities? This would force the current population who currently reside in the village to find schools places outside of the direct area Thus adding to the car emissions and further reducing air quality. The smaller neighbourhood centre at Talke and the heritage implications of the Grade II listed, Wedgewood Monument are highlighted. Other factors identified include amenity impacts for existing residents; environmental damage, mining legacy and impacts on watercourses & drainage.</p>	
<p>Land situated at southwest of High St, Kidsgrove & objection to its omission as a preferred site in the Draft Local Plan. Reference is made to a 2021 Call for Sites submission made for this site & supporting documentation from Aspire Housing, the adjoining landowner, through whose land access is proposed, confirming the Association's in principle agreement to the proposal. It is considered that development would have minimal adverse impact on the purposes of Green Belt, particularly vis a vis sites that are currently preferred. For reasons including Biodiversity Net Gain, housing density & types, the Council has seriously over-estimated the number of new homes which will be delivered from its current allocations e.g. NC13. Newchapel is a very sustainable location for new housing, with excellent nearby facilities and infrastructure to accommodate additional housing. The land promoted, being level, grassed and only occasionally used for rough grazing, does not exhibit any significant ecological constraints, whilst professional highway consultants have confirmed that access and highway arrangements can be readily provided to serve the site's development.</p>	
<p>Object to the omission of sites, HM8 (Land West of Heathcote Road, Miles Green) & HM10 (Land off Victoria Avenue, Miles Green). Arguments advocating their allocation as residential development sites</p>	

<p>include: aside from Green Belt, not being subject to any statutory or non-statutory designation; relationship to the existing built form; not harm the wider Green Belt & its purposes; a defensible boundary to the Green Belt can be achieved, whilst releasing the land; within convenient access to a wide range of facilities by sustainable modes; considered to be developable for housing within the first 5 years post adoption of the Local Plan.</p>	
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39. Glossary

Summary of Main Issues Raised	Council Response
<p>Glossary should be expanded to include definition of terms: -</p> <ul style="list-style-type: none">• Health Impact Assessment (and Rapid Health Impact Assessment)• Design Review Process• Energy Hierarchy• Mitigation Hierarchy• Biodiversity net Gain• Housing and Economic Needs Assessment• Standard Method• Nature Recovery and Local Nature Recovery Strategy	<p>The items listed will be included in the glossary of terms in the Regulation 19 version of the Local Plan.</p>

40. Appendix 1 Monitoring Framework

Summary of Main Issues Raised	Council Response
<p>SO, I – XII, and SO-VII are not represented in the monitoring framework, they should have indicators which trigger remedial action inadequate progress is being made in the plan period</p>	<p>The council will review its monitoring framework in response to the issues raised in the First Draft Local Plan and any other additional policies included etc.</p>
<p>Plan needs to clearly set out what would happen if monitoring showed under-delivery against the agreed housing trajectory.</p>	
<p>The Housing Mix policy delivery monitoring indicator and remedy suggests that if housing sites are not delivering the mix required the resulting remedy would be advise DM not to permit housing scheme of the ‘wrong’ mix. Another remedy could and should be to negotiation with developers to find a viable and deliverable housing mix solution on a case-by-case basis. Such other remedies should also be reflected in the monitoring framework.</p>	
<p>Figures on affordable housing provision should be published as part of the monitoring framework.</p>	

41. Appendix 2: Employment Sites in Supply

Summary of Main Issues Raised	Council Response
The current availability of existing not fully utilised employment use sites in the locality e.g. at Peacock Hay and the Tunstall bypass	Appendix 2 will be amended in the light of comments raised and additional monitoring information gathered in the preparation of the First Draft Local Plan.
Will the demand for these sites be monitored before a decision is made to release Green Belt land?	
Supporting information is needed to explain the purpose and context of this table to the plan-making process, particularly considering discussion elsewhere in the plan about the potential need for greenbelt release	
NC13: Comments raised to object to this site.	
Support with reference to strategic location TK30 (<i>no further detailed comments provided as a representation</i>)	

42. Appendix 3: Borough Council Car Parks in Asset Rationalisation Programme

Summary of Main Issues Raised	Council Response
Smaller local car parks are vital to the small businesses that are located close by.	The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan). The council will also reflect on changes to national planning policy in preparing the Final Draft Local Plan and any other relevant strategies prepared that has an influence on the Plan.
Objection to the loss of car parks, including Hassell Street, Cherry Orchard, Windsor Street car parks. You are taking their choice away.	
Concern that some residents rely on small car parks as they are closely located to services and small business i.e. health provision.	
A petition submitted by several local businesses - 'Save Hassell Street Car Park' (450 signatures in hard copy and approximately 700 online signatures).	
Need to consider the safety and access implications of the loss of car parks. Many members of the community feel less safe on a multi-story car park.	
Need to consider whether there is sufficient car parking provision in Newcastle-under-Lyme Town Centre and its immediate environs	
Any replacement of the Midway Car Park needs to consider safety and accessibility arrangements	
Investment in 'Sky Building' should be prioritised instead.	

<p>The list of Council Car Parks is identified as having potential for windfall development needs to include some kind of explanation as to why this is included in the plan, and what the status of the list is. If the intention is for ongoing work on car park rationalisation will feed into the Reg 19 plan, this needs to be explained within Appendix 3</p>	
<p>Support the allocation of sites, including former car parks for housing, or mixed-use allocations if they are no longer needed for their current use. Allocations provide greater certainty for developers than bringing schemes forward on a windfall basis.</p>	
<p>This directly contravenes Strategic Objective-III, fewer usable car parks in the town will further reduce the number of visitors and hasten the decline of the town. Having a single multi story car park is not going to suit the needs of the town.</p>	

43. Appendix 4: First Draft Local Plan Site Allocations Maps

Summary of Main Issues Raised	Council Response
Policy map is not clear as to where boundary lies on NC77 SHELA Report p. 163.	The council will consider the issues raised from the consultation on the First Draft Local Plan in the preparation of the Regulation 19 version of the Local Plan (the Final Draft Local Plan). A searchable interactive map was produced for the First Draft Local Plan and will be updated and published as part of the Final Draft Local Plan.
NC78 & NC79 Development in these localities is not desired – traffic and lack of infrastructure.	
Map 1 in the policies booklet shows as Preferred site SP11 as not in the Green Belt, which it is currently, therefore this map is inaccurate and a misrepresentation of the site.	
HBF note that Draft Policies Booklet shows maps of the Green Belt and other policy designation areas. HBF would encourage the Council consider producing an interactive and searchable web based Local Plan policies map utilising GIS.	

44. AB2 (Strategic Location)

Summary of Main Issues Raised	Council Response
<p>Cheshire East Council - Concerns over highways and access implications including widening of the A500 and the impact on Junction 16. Bartholmey conservation area located 900m from site – heritage impact assessment needed. Site triggers SSSI impact zones of Oakhangar Moss. There is a lack of sufficient evidence or information to make a meaningful consideration of the site – heritage impact assessment, transport assessment, land impact assessment etc.</p>	<p>The council included three potential strategic locations in the draft Plan. These sites were not proposed as allocations in the draft Plan however views were sought on the principle of allocating strategic sites in the draft Plan and then also on the site options themselves. The council will consider the responses received to both the principle of development and the individual locations including from neighbouring authorities and other prescribed bodies and determine the appropriateness of allocating one or more major employment sites.</p>
<p>Stoke-on-Trent City Council - strategic employment site. Given the functional economic area our respective Council's share, the City Council would in principle support such a development but would encourage end uses which provide better quality, higher paid and secure jobs than those that are currently on offer, in the main, in existing warehousing development.</p>	
<p>United Utilities - Site partially in Groundwater Source Protection Zone 3. Further clarity on point of connection required. Site may be unserved and nearest catchment may be UU network.</p>	
<p>Historic England -Consider the impacts to nearby heritage assets including Audley Mill Grade II, Audley Conservation Area and heritage assets within.</p>	
<p>Alsager Town Council – Development could result in an industrialised employment belt with a reduction in Green Belt in the area.</p>	
<p>Balterly, Betley and Wrinehill Parish Council – congestion at Junction 16, this allocation is supporting a logistics-based low skilled, low paid economy which the Council should not be targeting</p>	
<p>Weston and Crewe Green Parish Council - The potential release of this Green Belt site as a strategic employment allocation will have serious implications for the Parish and could create pressure for the release of Green Belt within the Parish undermining the principles and function of the Green Belt in the area. Conurbation of the Parish with NUL</p>	

Barthomley Parish - It is the view of the Parish Council that without a strategy in place to cover the development of the A500 and its surrounding areas, involving all major stakeholders, the proposals will be unsustainable and will create addition traffic, thereby impacting negatively on the infrastructure of roads and other facilities in and around Barthomley as well as creating pollution and increases in the number of journeys undertaken in the area.	
The overall vision refers to jobs but makes no mention of strategic employment sites.	
Concerns about traffic impact and congestion, particularly in Audley. Concerns over the quality of the road network in Audley and its surrounds.	
Concerns around increased pollution from the warehouse and associated traffic from this development.	
Evidence suggests no need for this site. When there are new warehouses already going up in Crewe, Alsager, Chatterley Valley, Festival Park/Wolstanton, & Tunstall to name only the closest. Some of these remain empty.	
The size of the site is disproportionate and extends to larger than Audley and Bignall End	
Undeveloped land, carbon storage area	
Isolated site – lack of access to sustainable transport options	
Park Lane would need to widen to allow for Heavy vehicles which will lead to the destroying of large hedgerows which reduces biodiversity	
An increase in vehicles in the area and the use of small country lanes for lorries to the AB2 site will make exercising in this area unsafe (walking, cycling, horse-riding)	
The site is a mixture of grade 3a and 3b agricultural land - cannot afford to lose such land	
The habitat for wildlife, birds and animals, including those protected under the Wildlife and Country Act 1981.	
The site has limited access to services and utilities such as gas & electric.	

The exceptional circumstances for the site such as the employment need has not been evidenced, particularly when the employment need identified in the Plan has largely been met with land in supply (Appendix 2) of 49.9 hectares.	
Local jobs for Audley residents unlikely as a result of development due to age demographic of village and the type of jobs being proposed.	
A range of significant adverse impacts (visual, noise, light, disturbance, air quality) including impact of night-time light pollution	
Undermining of regeneration of the urban conurbation, by developing greenfield land in the countryside (regeneration is one of the purposes of Green Belts)	
Due to remoteness, limited economic benefits to Newcastle-under-Lyme.	
Concerns with the impact of TK30 (which is close to Audley). Combined, these sites make AB2 especially harmful.	
The local plan evidence work should confirm the contribution the site makes to Green Belt purposes as different assessments are made in different evidence-based documents.	
AB2 did not score positively in the sustainability appraisal.	
SHELAA 2022 found that site was not in deliverable/developable supply given that it is isolated greenbelt, partly affected by flood zones and has poor access to services and facilities – What has changed?	
Types of jobs proposed are likely to be replaced by automated processes and artificial intelligence	
The land is currently covered by policy N20 within the Saved Policies of the Local Development Plan as an “Area of Landscape Enhancement.” - Why has this changed?	
Public footpaths on site, enjoyed by walkers	
Due to location, the site would create jobs in Cheshire not in Newcastle-under-Lyme	
The area acts as a buffer between Audley Parish and the M6/ A500 noise and light pollution	

Employment provision should be focussed more towards town centres as a means of economic regeneration not rural locations.	
Destroying greenbelt land without demonstrating exceptional circumstances is counterproductive to the strategic objectives SO1, SOIV and SO XII.	
The only thing needed here is a Truck Stop of lorry drivers	
Loss of lorry park layby	
Noise, light and other pollution concerns.	
Loss of ancient, protected hedgerows.	
Any warehouses that are put up should blend in with the landscape, be friendly to wildlife and help to clean the air, with green roofs and rainwater harvesting (the A500 floods now when there is heavy rain)	
Comments from agent promoting the site. The strategic location should be extended to a boundary which has been previously submitted to the Council which includes an extra 8 ha. Several technical documents have been submitted in support of the development of the strategic location including a consideration of the need for the site, Green Belt and highways implications of the sites etc.	
Comments from the Chamber of Commerce supporting the proposed development and recognising the strategic importance to Staffordshire.	
Concerns over loss of Green Belt	
Concerns over infrastructure impact	
Objection regarding the loss of topsoil.	
Impacts on local flora and fauna	
Impacts on flood risk including surface water flooding.	
Proposed use of lanes as emergency access routes, is a dangerous proposition given their limited visibility and inadequate space for pedestrians, cyclists, horse-riders, and vehicles.	
Impact of reduction in bus services to Audley needs to be factored in	
Impacts on Audley – perceived ‘rat run’	
Amenity impacts on neighbourhood housing	

<p>Natural England - Part of the site is good quality semi-improved grassland and potentially of high wildlife value. Potential for air quality impacts on designated sites e.g. Midland Meres & Mosses Phase 2 RAMSAR (Oakhanger Moss SSSI and Black Firs & Cranberry Bog SSSI). Some of site is best and most versatile land (ALC).</p>	
<p>National Highways - National Highways has been engaging with the applicant's consultant on development at strategic employment site AB2 as part of pre-application consultation since 2018. We issued comments to the consultant regarding trip generation, VISSIM model developed for M6 Junction 16 and the associated Local Model Validation Report (LVMR) in June 2023. National Highways are still in discussion regarding trip generation; therefore, we are not currently able to comment on the impact of the development on the nearby M6 J16 and other SRN junctions in the area. However, we understand that there will be a requirement to improve M6 Junction 16, with a potential mitigation scheme involving widening and inclusion of an additional lane on the gyratory of the junction. This potential mitigation scheme would require the removal of the existing heavily used layby on the A500 westbound approach. No improvements are currently proposed at the A500 / A34 Talke Interchange due to development at Site AB2.</p>	
<p>Concerns that use would be for logistics with limited employment opportunities</p>	
<p>Audley Parish – Severe impacts on Audley (included above)</p>	

45. KL15 (Strategic Location)

Summary of Main Issues Raised	Council Response
The concentration of housing in Keele is disproportionate to its scale.	The council included three potential strategic locations in the draft Plan. These sites were not proposed as allocations in the draft Plan however views were sought on the principle of allocating strategic sites in the draft Plan and then also on the site options themselves. The council will consider the responses received to both the principle of development and the individual locations including from neighbouring authorities and other prescribed bodies and determine the appropriateness of allocating one or more major employment sites.
The green spaces as they exist currently are a major factor in making the area attractive to residents. The capacity of vacant buildings should in the first instance be fully assessed & exploited within the 2040-time horizon, moving the emphasis away from removing land in the Green Belt.	
Wider issues argued include: development of Green Belt land will result in Silverdale and Keele merging into one large urban conurbation. Green Belt areas play a vital role in preventing urban sprawl, protecting wildlife habitats, and providing recreational spaces for local residents. Permitting development on Green Belt land could irreversibly damage the natural environment and undermine sustainable growth in the region. It is essential to prioritize brownfield development and explore alternative areas for development to preserve green spaces and maintain a balanced urban landscape. The number of empty homes in the Borough, vacant & derelict buildings in the town centre and development here being preferred as a residential & entertainment focus, reduced population figures in the 2021 census, Government statements on areas that should be the focus of development, heightened physical (e.g. road capacity, condition & suitability) & social infrastructure pressures such as GP's, dentists & schools, recreational, biodiversity & public health value of Keele golf course in particular, increased carbon emissions impacts.	
Historic England - Land East Keele University – Strategic Site – consider impacts to Keele Hall Registered Park and Garden Grade II and heritage assets within this area.	
Allied to those summarised above, directly specific objections to KL15 include: The University currently having a number of student blocks that are empty & that student numbers are unlikely to increase dramatically. Previous slow build-out rates of the University. The site being between two deciduous woods which it is suggested will likely contain bats (a protected species), loss of recreational green space (with consequent impacts on physical & mental health), rights of way & other wildlife	

<p>impacts. Increase in traffic & worsening congestion during & after construction. This heightened traffic flow poses significant road safety concerns for pedestrians, cyclists, and motorists. Elevated air pollution levels. Scale and design may not align with the existing local vernacular which could reduce visual appeal. Social displacement could occur through shifts in house prices reducing affordability for existing residents. Loss of food production capabilities. The increased traffic, noise, and disruptions could negatively affect the university's academic environment and overall campus experience for students and staff. Amenity impacts (such as noise pollution and loss of tranquillity) on existing residents & negative effects on the character and identity of the area. The grasses found (long established through the site's use for agriculture and recreation) aid carbon sequestration, which is significant in tackling climate change and reaching net zero targets. Site is noted as biologically important and a bio-diversity alert, with Bluebells which are found here are a protected species. Access into the site cannot be achieved without destroying green space. The science park is considered to have expanded enough already. Subject to retention of the areas of woodland, this site may be a better alternative to development of the Keele golf course site</p>	
<p>This site is one identified (amongst others in the locality) whose development could impact upon Thistleberry.</p>	
<p>Stoke-on-Trent City Council - strategic employment site. Given the functional economic area our respective Council's share, the City Council would in principle support such a development but would encourage end uses which provide better quality, higher paid and secure jobs than those that are currently on offer, in the main, in existing warehousing development.</p>	
<p>A through road from KL15 should not be created, as it would encourage huge amounts of traffic from the Keele sites (as well as the university) to and from the M6, for example, via Sutherland Drive and other roads in the Westlands area.</p>	
<p>If development were to take place & it may be preferable to develop here rather than on the Keele golf course, it is vital that a green woodland</p>	

area is kept between KL15 and Paris Avenue estate. The woods (such as Flagstaff Plantation, but not only that part) can be seen from miles around including the other side of the town, and therefore they must be protected not only for nearby residents, but to maintain the character and environment of Newcastle as a place overlooked by green hills all along the western side	
No exceptional reason for Green Belt boundary changes.	
The combination of SP11, TB19, SP13 and KL15 will lead to a huge new conurbation.	
The science park has expanded enough	
Concerns over infrastructure provision	
Loss of green / open space	
Loss of a greenfield site	
National Highways - The site is likely to have an impact on the Strategic Road Network (SRN) in terms of traffic. The immediate SRN junctions likely to be impacted are: M6 J15; A500 (Queensway) / A34 roundabout	
Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.	
Key that woodland area is kept between KL15 and Paris Avenue estate.	
Allocation of the site would lead to the destruction of wildlife and habitat	
Allocation of the site would lead to the demise of ancient woodland.	
Natural England - Reiterating those comments submitted previously to the Local Plan Issues & options consultation, the site includes areas that are priority habitat- i.e. deciduous woodland, and The Butts and Hands Wood which is listed as Ancient & Semi-Natural Woodland. Also adjacent to	

Rosemary Wood Site of Biological Importance, Barker's Wood and Hands Wood and Pie Rough Biodiversity Alert Site. Potential for air quality impacts on designated sites. Potential impact on best and most versatile agricultural land.	
Concerns regarding the impact on the A525	
The increased traffic, noise, and disruptions could negatively affect the university's academic environment and overall campus experience for students and staff.	
Potential loss of best and most versatile land	
Comment from Keel University. Supportive of the vision and site KL15 which can bring forward the site as an exemplar of sustainable development. Committed to working to ensure that the objectives of the site are achieved.	
Impact upon Public Rights of Way	
Trees that line the A525 should be kept.	
Opposition to the allocation of this site from a developer interest with a headline assessment undertaken & advocacy presented for an alternative development proposal for an area of Land at Madeley Heath incorporating a Planning Statement and a Transport assessment.	
Development offers a generational opportunity for regional scale growth which could provide a step-change in the Borough's employment offer that supports the knowledge-economy and which will significantly increase job numbers, job quality and job choice. However, the growth of Keele University and its Science Park must be supported by a sustainable spatial strategy. This must include the release of further land in the University Growth Corridor	
Encouraging university staff to be based in the Borough by the provision of better-quality homes will reduce the numbers commuting from across the region and contribute to the prosperity of the local economy, helping to support the viability of the urban centre of nearby Newcastle under Lyme. Given the campus' location, it is recognised that this would require	

<p>some Green Belt release in and around the Keele University area to create new properties and this would be supported, subject to the requirement that 30% of the housing total comprises affordable housing.</p>	
<p>Keele University is an internationally recognised centre for research and scholarship, it is also seen as a pioneer in the development of green energy and green technology. Within the Borough the University is one of the main employers and its contribution to the local economy is substantial. If the University is to continue to grow, it should have access to development space. Potential for high value industry & jobs to be established in specialist roles such as engineering, design & digital enterprises.</p>	
<p>Keele University is committed to working with the Council and other stakeholders in bringing forward the allocated site as an exemplar of sustainable development.</p> <p>The University agrees that development should be masterplan led and should maximise the benefit of sustainable transport links and the Smart Energy Network Demonstrator and is fully committed to working with other landowners to realise these objectives.</p> <p>Plans should take on board the need to create a more accessible and inclusive Public Transport Network, moving away from the East/West lineage of the existing system, and using the Local Plan to open up links to the North and South of Keele University, supporting more circular public transport solutions that link the Urban Villages to core employment sites and amenities.</p> <p>The University contends that there would be limited conflict with the five purposes of Green Belt identified the NPPF. Keele is a village, and the proposals would not therefore involve the sprawl of a large built-up area or the coalescence of existing towns. The proposals involve a limited release of countryside which is clearly defined and viewed in the context of existing built development to the east and west. This is not a valued</p>	

landscape for the purposes of the NPPF. The proposals will not affect the historic core of Keele Village and will not prejudice urban regeneration within Stoke on Trent, which has its own separate employment allocation. This approach is considered far more sustainable than pushing the Borough's employment and housing requirements to settlements outside the Green Belt, which are significantly less well equipped to deal with the pressures that it brings. Although there may be arguments for an equal distribution of opportunity, consideration needs to be given to the wide impact of a distributed solution. Focusing development around existing infrastructure which can be sustainably enhanced to support both housing and economic growth should be given priority

Keele Parish Council have worked with the University on the development of the Keele Neighbourhood Plan alongside the University's Masterplan. Support is given to the University's ambitions for growth over the period covered by the Local Plan, and the aim to serve as a hub for technological business development in the area. It is believed this is exactly the sort of development the Borough needs, and therefore do not object to the extension of the Science Park into Green Belt, but caution is urged owing to previous growth rates.

46. TK30 (Strategic Location)

Summary of Main Issues Raised	Council Response
<p>United Utilities - TK30 (along with a number of other sites) is on the periphery of the area of operation of United Utilities. Development here may result in the connection of a large amount of flows into a small wastewater pumping station that is believed to pumps northwards. Offset distances from utility apparatus may be required. If this site is to be allocated, they would wish to work with the site promoter to ensure that the point of connection is agreed and to ensure that any necessary upgrades to infrastructure are co-ordinated with the delivery of development. It is requested that this be addressed in the Local Plan's site-specific requirements (should allocation continue to be pursued) including, as appropriate, any in the wider area. It may also be the case that the site promoter intends to connect to assets owned and operated by Severn Trent rather than United Utilities.</p>	<p>The council included three potential strategic locations in the draft Plan. These sites were not proposed as allocations in the draft Plan however views were sought on the principle of allocating strategic sites in the draft Plan and then also on the site options themselves. The council will consider the responses received to both the principle of development and the individual locations including from neighbouring authorities and other prescribed bodies and determine the appropriateness of allocating one or more major employment sites.</p>
<p>Stoke-on-Trent City Council - strategic employment site. Given the functional economic area our respective Council's share, the City Council would in principle support such a development but would encourage end uses which provide better quality, higher paid and secure jobs than those that are currently on offer, in the main, in existing warehousing development.</p>	
<p>Historic England - consider impact on Wedgewood Monument Grade II listed.</p>	
<p>Natural England - If this site is considered for release and allocation the following should be taken into account:</p> <ul style="list-style-type: none"> • The site includes areas that are priority habitat- i.e. deciduous woodland • Part of the site is agricultural land classification grade 3 and potentially best and most versatile land. • Potential for air quality impacts on designated sites. • Adjacent to Bignall End Coal Yards Site of Biological Importance. 	
<p>National Highways – The site is likely to have an impact on the Strategic Road Network (SRN) in terms of traffic. The immediate SRN junctions likely to be impacted are:</p>	

M6 J16; A500 / Alsager Rd; A500 / A34 / Newcastle Road roundabout (Talke Interchange); A500 / A527

Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed to determine the extent of their potential impacts on the operation of the SRN in the area.

Cheshire East Council - Whilst recognising that the plan is not proposing to allocate the site at this stage, there is a lack of sufficient evidence or information to enable meaningful consideration of the planning merits or otherwise of the site. The following was highlighted:

- Concerns about the impact of this site on the capacity of the A500 and the junction of the A500/B5472/A531 roundabout. A transport assessment would be required to consider what mitigation is needed. The council would also require this assessment to consider the impacts of its proposed A500 widening scheme (to a dual carriageway) and, if this is shown to address forecast problems, there would be a policy requirement to contribute towards the council's costs of delivering this project.
- The assessment should also consider, in conjunction with National Highways, how the operation of the B5078 Radway Green Road/Junction 16 of the M6 is impacted by these development proposals.
- An assessment should be undertaken to consider how access to this employment site could be enhanced by public and sustainable transport from Alsager, Crewe, Sandbach and Congleton including demand projections.
- An assessment of the highway impacts at the junction of the B5077/A5011 should also be undertaken.

<p>This site would require a degree of offsite mitigation. It is not entirely clear as to how this site would be accessed. The only existing bus service (route 4A) uses the Talke Road which goes over the A500 and does not seem like an obvious way to access TK30. It would be a deviation for the 4A to access this site as this route is already part of a larger complicated network of services (3, 3A, 4, 4A).</p>	
<p>Traffic (including A500 & A34 congestion which national audits highlight as at near capacity) & noise pollution issues would be worsened. Significant increases in HGV traffic and more issues associated with the use of existing routes as rat-runs.</p> <p>Road surfaces are in a poor condition (worsened by excess weight vehicles), with many narrow local roads making traffic flow more difficult, particularly for emergency vehicles and public transport. Limited or no crossing points exists. Access and egress via junctions will become a lot more difficult and dangerous. Traffic calming measures are already in place at certain points.</p> <p>Previously stated objections from the Highways Authority for much smaller residential proposals are highlighted.</p> <p>Public transport provision has been reduced & timetables are often affected by traffic congestion, especially during school term-time.</p> <p>Public right of way & cycle route impacts. Increase road users would make it dangerous for horse-riders which is a popular pastime and valuable to the local economy.</p> <p>More off-road parking would need to be provided if development were to take place.</p> <p>Road safety measures should be implemented, such as at the chicanes in Talk Pits towards Kidsgrove on Deans Lane & Cedar Road.</p>	

<p>Access routes into the site are questioned as to their suitability.</p> <p>While TK30 is proposed as a mixture of employment and/or housing, this is acceptable in general terms if access is from or near the A500 and not Deans Lane, since the traffic effect of the latter on the centre of Red Street would be completely unacceptable. The proposal shows a gap from Deans Lane for the path to the Wedgwood Memorial; this gap should be much wider so as to provide a better view of the hill and the development area to the south-east of the memorial should not come so close to the memorial.</p>	
<p><i>Social infrastructure:</i></p> <p>GP & dental (particularly for NHS) appointments are problematic/impossible to obtain. Reference to a recently closed GP practice (Waterhayes). Will a new pharmacy be established & how will any new services be staffed?</p> <p>Available school places across the age range are limited or at capacity. Current class sizes are also at maximum levels advised, with buildings in a poor state of repair. The creation of a new school would require the support of Staffordshire County Council. Retention of the former Hilltop school is suggested as it may be required should development take place.</p> <p>Policing pressures.</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>Run off from roads after heavy & sustained rainfall, with excess water being released from drains.</p> <p>The sewage network is not capable of coping with the increased demands from new development.</p> <p>Impact of development on groundwater and surface water contamination, allied to water supply difficulties of existing residents, noting issues that have arisen previously.</p>	

Biodiversity:

Risk of irreversibly damaging ecosystems, disrupting delicate habitats, and contributing to the loss of biodiversity.

The proximity of the proposals will affect the local nature reserve and ancient woodland of Parrots Drumble. Impacts could include: Trampling and vegetation wear, soil compaction and erosion, contamination (including nutrient enrichment (for example from dog fouling), as well as an increase in litter and a greater risk of fire. Corridors, including those local wildlife groups and Staffordshire Wildlife Trust helped established, could be harmed.

The European Hedgehog is protected against intentional harm and consultation needs to be made with local rescue charities and organisations to properly assess the damage caused.

Other species highlighted include: Wild rabbits, bats, badgers, newts, lapwings, frogs, toads, field mice, butterflies, foxes, red kites, skylarks, woodpeckers, sparrow hawks

Character:

There will be impact through either the loss or damage to local listed buildings and the conservation area boundary at Talke. Red St Monument (& its retention) is significant to the community. Attention is also drawn to the dry-stone walling running along the entirety of Crown Bank.

Deliverability:

Representation FDLP5025 (considered as part of Table 4 Strategic Locations) submitted on behalf of Harworth's Group in promoting the site's development provides extensive detail on aspects including: Vision document, indicative proposed masterplan, ecology & landscaping, highways access appraisal, heritage briefing note, geo-environmental desk study, note on socio-economic benefits, ecology and landscaping combined technical note.

Opposition to the allocation of this site from a developer interest with a headline assessment undertaken & advocacy presented for an alternative development proposal for an area of Land at Madeley Heath incorporating a Planning Statement and a Transport assessment

Other

The scale of development is disproportionate to the size of the existing communities, as a small semi-rural, historic village, with a significant elderly population (also noting the Local Plan's settlement & retail centre hierarchies). The proposed developments would be overbearing, out of scale and out of character compared with existing developments in the area. There is also the potential that it coalesces settlements.

Services & facilities are very limited, with Red Street comprising of a pub, church, a butchers and community centre. The post office and a shop have been lost in the recent past, with protection sought for those that remain, especially as there are no current plans for any further provision detailed in the Local Plan.

The Borough's population is in decline, negating the need (& desirability) for the extent of new homes & employment highlighted. Existing warehouses remain empty including in Cheshire East, North Staffordshire & the Potteries and the recent permission at Chatterley Valley offers substantial further provision. Compared to AB2, this site (owing to it being less large) may be the least-worst option.

The Government's housing numbers are only advisory & lower density development in the Green Belt is viewed to be against national policy. Extant permissions and recent over-supply should mitigate against increased development pressures.

There have been several schemes progressed: Parkhouse Industrial Estate, High Carr Industrial Estate, residential estates at Waterhayes, Mitchels Wood, Badgers Croft, Friesian Gardens, Moss Grove and the very

recent Wedgwood View which collectively means no further extensive development should be required.

Loss of greenbelt land & wider impacts on openness, as well as urbanisation effects and population density increases. Exceptional circumstances for development have not been justified and the associated five purposes of Green Belt (as identified in the NPPF) have not been fully addressed. Permanence is integral to this. Conflicts with other aspects of Government policy such as food security, ground conditions & pollution and environmental protection.

Recent PM & Ministerial statements assert the brownfield first approach.

Construction of houses on greenbelt land will lead to the loss of natural buffers that help mitigate the impact of climate change. These areas act as carbon sinks, absorbing and storing carbon dioxide, while also helping to regulate temperature and reduce the risk of flooding.

Green Belt contributes to the overall physical and mental well-being of communities, promoting healthier lifestyles, providing outdoor recreation opportunities and fostering a sense of pride & identity.

Preserving greenbelt land also serves to safeguard the communities' collective heritage and ensure a high quality of life for present and future generations.

Alternative solutions should be explored, promoting sustainable urban planning (including focusing on smaller, affordable housing options to create a more balanced community including for single & elderly people, and building at higher densities nearest the main centres), as well as investing in brownfield redevelopment, existing areas (such as run-down parks) & bringing empty homes back into use. There are a significant number of brownfield sites available throughout the area, including in

Stoke on Trent, whose development would help enhance the look of the area. Only a small proportion of sites identified to date in this locality are brownfield opportunities. Utilising mechanisms such as compulsory purchase are highlighted.

A smaller scale proposal (less than 300 homes) may be more palatable. Adequate provision for parking should also be made.

Permanent loss of (high grade) agricultural land.

High pressure gas mains are located here.

Health & safety concerns of construction, particularly for the young & elderly.

Spoiling of natural or existing contours and/or destroying traditional field patterns.

Smells & odours from Walley's quarry (Silverdale) are an amenity issue. Increased development will worsen air quality.

Damage to the landscape means that there will be a general loss of visual amenity for all residents of Talke and Talke Pits.

Loss of privacy & natural light.

Increased light & noise pollution.

Whilst affordability issues are recognised, how would the type of homes that could be built address this?

Quarried areas within the site could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity.

Identified open space strategy sites should be retained.

The wellbeing of the community should be prioritised in decisions that affect the natural environment.

If the proposals were to be advanced, they would contravene the UN's 17 Global Goals for Sustainable Development.

Mining legacies including shafts and an identified Coal Authority 'High Risk Area'. Potential for damage to existing properties to occur through ground disturbance & exacerbating subsidence. British Geological Survey evidence of earthquake activity.

Property values will be negatively affected.

Changes in living & working practices will alter the design and function of new homes. Automation will influence the type of employment that could be offered, and the longer term need for warehouse/lower skilled roles.

Collaborative dialogue should take place with community members, environmental experts, and relevant stakeholders, to find innovative and sustainable solutions that balance the need for housing with the stated imperative of preserving green spaces. Consultation (including the drop-in events, notification methods, timeframes for response & general awareness) to date has not been easy to engage with.

47. AB12 Land East of Diglake Street

Summary of Main Issues Raised	Council Response
Concerns over proposed access arrangements and secondary access is not appropriate (including concerns over visibility)	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Likely to increase traffic volume around the site and through the village. On street car parking is an issue	
The condition of the local road network is an issue	
Impact of reduced bus services need to be considered	
Concerns over impact on existing infrastructure / amenities provision. Lack of infrastructure capacity to deal with the site -Schools -Doctors / Dentists	
Local empty shops and pubs should be converted into residential accommodation	
Specific concerns over access to the site from Diglake Street	
Disagree with scale of proposals and associated impact	
Close to the Diglake Mine	
Impact on agricultural land	
Flora, fauna and wildlife impact	
Noise, light and other pollution concerns	
Flooding concerns	
The site is ransomed and incapable of delivering safe and satisfactory access.	
Close to the Wedgewood Monument	
2021 census indicated that the overall population of the Audley ward is in fact static (when compared to figures for 2011) therefore why the need for all these extra houses?	
To further increase the congestion and pollution will be detrimental to the health of the residents of Audley for generations to come.	
Provision for elderly population in village – bungalows etc?	

Staffordshire County Council - The Highway Authority would raise concern with the outlined access strategy. I can confirm that the site has sufficient road frontage on Diglake Street to create an access however there are off-site access issues that will need to be fully addressed in regard to on-street parking on Diglake street and intensification of use of the Diglake St/B5500 junction. Access to the field is presently taken from the B5500, however it is of insufficient width in its current form to serve the proposed development unless it can be improved. Preference would be for the development to be served via the higher order road (B5500).	
Nature reserves such as Parrots Drumble will be greatly affected by any proposals	
GB study 2020 deemed site has a strong contribution to the Green Belt. The site will have impacts on Green Belt purposes	
Agricultural Grade 3 farmland	
Green Belt impacts including urban sprawl	
Bungalows should be provided.	
Roads in Audley are often subject to flooding, building on greenfield will increase flooding	
Impact on landscape	
Change of bus services	
Loss of open space	
Concern over the capacity of local utilities and infrastructure including sewage etc.	
Historic England - No nearby heritage designated assets.	
Impact on the character and appearance of the area.	
United Utilities - Various sewer assets and associated combined sewer overflow pass through this site which will be a constraint to development.	

48. AB15 Land North of Vernon Avenue

Summary of Main Issues Raised	Council Response
Likely to increase traffic volume through the village. Traffic safety will be compromised. Concerns over access into the site.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Impact of the site's proximity to Diglake Disaster	
Impact of reduced bus services need to be considered	
Concerns over impact on existing infrastructure provision. Lack of infrastructure capacity to deal with the site including health, education, sewage, gas pressure and other facilities	
2021 census indicated that the overall population of the Audley ward is in fact static (when compared to figures for 2011) therefore why the need for all these extra houses?	
Audley already has the 10th highest incidence of asthma and chronic obstructive airways disease within Staffordshire; the highest for any of the rural practices. This is despite our smoking incidence being below the England average. To further increase the congestion and pollution will be detrimental to the health of the residents of Audley for generations to come.	
Agricultural Grade 3 farmland	
Provision for elderly population in village – bungalows etc?	
Road on Vernon Avenue is in poor condition, concern over car parking and increased traffic from development will cause this to worsen.	
Will new development be in keeping with existing housing?	
Allocation of Green Belt land contradictory to government's recent statements	
Natural England - This is adjacent to a traditional orchard according to our records and this should be taken into consideration.	
Bungalows and homes suitable for older people should be provided	
Impact on local nature reserves including Parrots Drumble	

Impact on loss of wildlife, flora and fauna	
Flood risk concerns, including surface water	
Amenity impacts concerns	
Ground stability concerns	
Concerns over the loss of character and appearance of the local area.	
Concerns over impact and proximity to Conservation Area and Wedgewood Monument	
Concerns over loss of amenity areas and outdoor spaces	
Cumulative impacts of homes proposed in Audley	
Landscape impacts and on character and appearance	
Concerns over parking provision in the village	
Sites should be located close to existing centres and community facilities and should not lead to the coalescence between Audley Parish Settlements.	
Climate change impacts	
Brownfield sites should be prioritised.	
Pollution impacts, light, noise etc.	
Historic England – no nearby heritage assets	
There are more suitable brownfield sites in Stoke and Crewe	
United Utilities - Sewer passes through site.	

49. AB32: Land Nursery Gardens Audley

Summary of Main Issues Raised	Council Response
The Nursery Gardens entrance into the site is not available to the public	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Concerns over access into the site.	
Likely to increase traffic volume through the village - A traffic survey is required before the site can be allocated.	
Impact of reduced bus services need to be considered	
Concerns over impact on existing infrastructure provision. Lack of infrastructure capacity to deal with the site.	
Object to loss of Green Belt	
2021 census indicated that the overall population of the Audley ward is in fact static (when compared to figures for 2011) therefore why the need for all these extra houses?	
Audley already has the 10th highest incidence of asthma and chronic obstructive airways disease within Staffordshire; the highest for any of the rural practices. This is despite our smoking incidence being below the England average. To further increase the congestion and pollution will be detrimental to the health of the residents of Audley for generations to come.	
Object to loss of Green Belt. Green Belt study 2020 deemed site has a strong contribution to the Green Belt	
Agricultural Grade 3 farmland	
Provision for elderly population in village – bungalows etc?	
Site was previously considered as a graveyard but planning permission was not granted because water table is too high	
Allocation of Green Belt land contradictory to government’s recent statements	
Park Lane is too narrow to support a development this size (AB32+AB33)	
If planning permission is granted, what guarantees do we have that the drainage to our property will be maintained in good order during the continuance of any works? (We have previously had foul drainage	

discharging from sewer hole covers on our property until United Utilities re-laid a length of the drain in development area AB32.	
Bungalows should be provided.	
The hedge where access is being suggested is owned by a resident, how will the council ensure the access does not affect land not owned by the developer?	
Park Lane is too narrow to support a development this size (AB32+AB33)	
Site is near Wedgewood Monument and Audley Conservation Area	
Ground is unstable	
Close to site of Diglake disaster	
Flood risk concerns, including surface flooding	
Site is near Parrots Drumble	
Amenity impacts	
Concerns over impacts on character and appearance of area	
Concerns over climate change impacts	
Impacts of flora, fauna and wildlife	
Impact on trees and hedgerows	
Cumulative impacts of sites in Audley	
Noise, air and light pollution	
Any development proposed should be small, family accommodation and homes suitable for the elderly.	
Staffordshire County Council - Masterplan led development appropriate from an access strategy perspective. Off-site highway improvements are likely to be required in Park Lane to support AB32 & AB33. Master plan to be supported with a Transport Assessment.	
Historic England – no nearby designated assets	
Should develop brownfield sites	
Loss of open space	
Destruction of traditional field patterns and hedges	

United Utilities - Sewers pass through this site which will need to be taken into consideration.	
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50. AB33: Land Off Nantwich Road / Park Lane, Audley

Summary of Main Issues Raised	Council Response
Likely to increase traffic volume through the village - A traffic survey is required before the site can be allocated.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Traffic safety and access concerns	
Concerns over the state and quality of the road network	
Impact of reduced bus services need to be considered	
Concerns over infrastructure. Lack of existing / proposed infrastructure capacity to deal with the site including education, health, sewage, utilities etc	
Object to loss of Green Belt / Greenfield land	
2021 census indicated that the overall population of the Audley ward is in fact static (when compared to figures for 2011) therefore why the need for all these extra houses?	
Audley already has the 10th highest incidence of asthma and chronic obstructive airways disease within Staffordshire; the highest for any of the rural practices. This is despite our smoking incidence being below the England average. To further increase the congestion and pollution will be detrimental to the health of the residents of Audley for generations to come.	
Object to loss of Green Belt. Green Belt study 2020 deemed site has a strong contribution to the Green Belt	
Agricultural Grade 3 farmland	
Provision for elderly population in village – bungalows etc?	
Site was previously considered as a graveyard but planning permission was not granted because watertable is too high	
Allocation of Green Belt land contradictory to government’s recent statements	
A development of this scale would change the rural character of Audley.	
Park Lane is too narrow to support a development this size (AB32+AB33)	
Site is near Wedgewood Monument and Audley Conservation Area	

Ground is unstable	
Close to site of Diglake disaster	
Flood risk concerns, including surface flooding	
Site is near Parrots Drumble	
Amenity impacts	
Concerns over impacts on character and appearance of area	
Concerns over climate change impacts	
Impacts of flora, fauna and wildlife	
Impact on trees and hedgerows	
Cumulative impacts of sites in Audley	
Noise, air and light pollution	
Any development proposed should be small, family accommodation and homes suitable for the elderly.	
Staffordshire County Council - Masterplan led development appropriate from an access strategy perspective. Off-site highway improvements are likely to be required in Park Lane to support AB32 & AB33. Master plan to be supported with a Transport Assessment.	
Historic England – no nearby designated assets	
Should develop brownfield sites	
Loss of open space	
Destruction of traditional field patterns and hedges	

51. BL18: Clough Hall, Talke

Summary of Main Issues Raised	Council Response
Sport England - Not demonstrated that this playing pitch is surplus to requirement or replacement provision is to be provided in line with NPPF paragraph 99.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Object to loss of wildlife on site	
No infrastructure to support development (doctors, schools etc)	
The field holds water that runs down the A34 and is marshy throughout all seasons. Poor drainage around area, the development will exacerbate these issues and lead to worse flooding on Park Avenue	
Too much development in Talke will put a strain on amenities	
Increased traffic increases pollution and decreases air quality. Road is not wide enough.	
Access constraints - It would be dangerous to have a road exiting on to the A34. Beech drive is a narrow and windy road and cars are already parked on pavements.	
Site includes some significant old woodland and cannot be dismissed as either brownfield or denuded land from intensive agriculture.	
United Utilities - There is a significant level of flood risk at this site. It is critical that any masterplanning of this site takes full account of this flood risk and we recommend that this is better understood as soon as possible.	
National Highways - Further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National highways should be consulted in this process.	
During school hours, cars park on both side of Clough Hall Road to pick children up from school, causing traffic to build. This site therefore contradicts policy IN2	
Why can't BL18 be reinstated as a playing pitch? This has more community value than housing. Object to loss of open space.	
Not enough signage on BL18 to indicate this was a potential allocation in the Draft Local Plan	
Land is prone to flooding, drainage and surface water impacts	

Popular recreation and dog walking site	
Talke does not have many green spaces.	
Natural England - This site includes parts of Sites of Biological Importance. We are unable to provide specific advice, but we would advise that if these allocations will cause adverse impacts on these sites they should be deleted as allocations in line with paragraph 174 of the NPPF.	
Officers at consultation event said that the entrance for any houses built would not be from Newcastle Road. This means that the entrance would be from somewhere from the surrounding estate. This would lead to an increase of traffic / air pollution/ traffic noise on what has always been a quiet estate.	
Object to loss of Green Belt / open countryside	
Site is in close proximity to Wedgewood Monument / heritage implications (proximity to Talke Conservation Area)	
Concerns over loss of character	
Climate change impacts	
Site does not meet the sustainability appraisal requirements	
Council's SHELAA does not support the allocation of the site	
Staffordshire County Council - Cycle and pedestrian connectivity to the A34 will need to be considered within any Master Plan. Master plan to be supported with a Transport Assessment.	
Historic England – no nearby designated heritage assets	
Opportunities for local employment has reduced.	
Local sewage infrastructure is not appropriate for development	
Light, air quality and noise pollution	
Lack of services in the local area	
Concerns over impact on local character, landscape. Concerns regarding urban sprawl	
Contrary to objectives in the sustainability appraisal	
Object to the loss of Greenspace on Clough Hall Playing Field.	

Impacts of Peacock Hay Road and new warehousing on local traffic levels etc.	
No connecting bus routes	
BL18 has several springs.	
Lack of employment opportunities in Kidsgrove and the surrounding area	
Concerns over sewage infrastructure at Red Bull Sewage Plant)	
Concerns over construction impacts	

52. BL24: Land Adjacent 31 Bunbury Street, Talke

Summary of Main Issues Raised	Council Response
<p><i>Residential amenity / Health and wellbeing:</i> Concern regarding height and potential overlooking / overshadowing of adjacent houses</p> <p>Impact on air quality - loss of clean fresh air and potential emissions and dust from construction activities that could affect air quality and residents' health (particularly taking into account the elderly population / ex-mining population with high incidences of Asthma and COPD)</p> <p>Impact on the health and wellbeing of the local community - concerns about how the construction projects will affect their access to services and overall quality of life (especially given the village has a high elderly population)</p> <p>Increased noise pollution disturbing the peace and tranquillity of the area</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Social infrastructure:</i> Insufficient / overloaded infrastructure - schools, GP surgeries (Talke and Kidsgrove), NHS dentists and shop/s Loss of open space Suggestion that the former Hilltop School site should be retained in case a school with a playing field is needed</p>	
<p><i>Transportation:</i> Staffordshire County Council - Banbury Street has restricted geometry to accommodate increase of two-way traffic as a result of development. Off-site highway mitigation works will be required to support the proposal.</p>	

Other Transport concerns

Concerns regarding increase in traffic - increased noise and disturbance, congestion, on-street parking problems, accidents, difficulties with residents getting in and out of driveways and impact on the bus service

Existing road system inadequate, in a poor state of repair and unsuitable to accommodate additional traffic – in particular, the roundabouts at the end of the village and throughout the Talke residential road network

National traffic audits indicate that the A34 and A500 are already at almost full capacity

Increase in heavy vehicles associated with construction works leading to further congestion and potential safety hazards

The nearby major arterial routes of the A34, the A500 and the M6 already regularly cause unacceptable traffic difficulties in Talke, causing large numbers of vehicles, including HGVs, to divert through the village when there are accidents on / the M6 is closed. Additional houses will only exacerbate these problems

The new housing sites will result in large numbers of people commuting from the sites, which is contrary to the Council's objective 'to reduce the need to travel'

Regarding the site access, Banbury Street is sometimes the only parking available for houses on the main road / access will be difficult with the A34 at capacity

Increased competition for / inadequate parking provision at retail outlets in the Talke Pits, Butt Lane and Kidsgrove areas

Parking during construction will be a major issue

<p>Inadequate public transport</p>	
<p>United Utilities - We are particularly concerned by site reference BL24. Our modelling data identifies a level of flood risk which is a significant volume which could affect a large section of this small site. This flood risk must be better understood before progressing this allocation further. In the absence of information which confirms that this site is developable either in whole or part, we must register an objection to the allocation of this site.</p> <p>United Utilities - Sewer passes through this site, in addition, we have noted a modelled risk of sewer flooding.</p>	
<p><i>Biodiversity:</i> Loss of green space, trees, hedgerows and natural habitats to a variety of wildlife (including hedgehogs, bats and hunting ground to buzzards) = net loss in biodiversity</p> <p>Detrimental impact on nature reserves and ancient woodland</p> <p>Request that local wildlife groups and owners of the conservation area be involved in assessing the potential impacts</p>	
<p><i>Character:</i> The amount of development proposed is out of proportion with the size of the village and would overwhelm it – adversely affecting the identity and special character of the historic village, rendering it a semi-urban sprawl</p> <p>Detrimental impact on the open landscape, scenic beauty, natural contours and rural setting of the historic village</p> <p>Impact on heritage assets, including the Wedgewood Monument (Grade II listed); Talke Conservation Area; the Roman road from Chesterton to Chester; dry stone walling along Crown Bank; listed buildings on Coal Pit Hill; and historic coaching inns</p>	

Historic England - No nearby designated heritage assets.	
<i>Green Belt:</i> Loss of Green Belt land / loss of openness of the Green Belt	
<i>Deliverability / Viability:</i> Site likely to be highly contaminated due to former industrial uses which could affect viability (asbestos found during demolition)	
<i>Other:</i> The level of development proposed in the Talke area is not in line with the settlement hierarchy	
Brown field sites in more urban areas where amenities are better, and infrastructure is already in place should be looked at first	
Loss of agricultural land	
Increased risk of disturbance to mine shafts and potential subsidence issues, in particular with the volume and weight of even more traffic	
Concern regarding land slippage in relation to adjacent houses	
Potential contamination of ground or surface water due to construction on previous mining operations	
Increased flood risk caused by run-off and damaged pipes from excess traffic	

53. BL32: Land at Congleton Road, Butt Lane

Summary of Main Issues Raised	Council Response
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Concern regarding height and potential overlooking / overshadowing of adjacent houses</p> <p>Impact on air quality - loss of clean fresh air and potential emissions and dust from construction activities that could affect air quality and residents' health (particularly considering the elderly population / ex-mining population with high incidences of Asthma and COPD)</p> <p>Impact on the health and wellbeing of the local community - concerns about how the construction projects will affect their access to services and overall quality of life (especially given the village has a high elderly population)</p> <p>Increased noise pollution disturbing the peace and tranquillity of the area</p> <p>[Loss of views / devaluation of property]</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Social infrastructure:</i></p> <p>Insufficient / overloaded infrastructure - schools, GP surgeries (Talke and Kidsgrove), NHS dentists and shop/s</p> <p>Loss of open space</p> <p>Suggestion that the former Hilltop School site should be retained in case a school with a playing field is needed</p>	
<p><i>Transportation:</i></p> <p>Staffordshire County Council - Off-site highway works required within Knowles Way to provide a suitable means of access to site.</p>	

Staffordshire County Council - Pedestrian connection to be provided between Knowles View and A34 Congleton Road	
<p><i>Water, drainage & flood risk:</i> United Utilities - Sewer passes through this site. Record of Sewer Flooding in the Vicinity of the Site: External Hydraulic Flooder? Circa 75m. In addition, we have noted a modelled risk of sewer flooding.</p>	
<p><i>Biodiversity:</i> Loss of green space (the last open green space between the houses), trees, hedgerows and natural habitats to a variety of wildlife (including hedgehogs, bats, owls, foxes, bees, butterflies, other insects and a variety of bird species) = net loss in biodiversity</p> <p>Detrimental impact on nature reserves and ancient woodland</p> <p>Request that local wildlife groups and owners of the conservation area be involved in assessing the potential impacts</p>	
<p><i>Character:</i> The amount of development proposed is out of proportion with the size of the village and would overwhelm it – adversely affecting the identity and special character of the historic village, rendering it a semi-urban sprawl</p> <p>Detrimental impact on the open landscape, scenic beauty, natural contours and rural setting of the historic village</p> <p>Impact on heritage assets, including the Wedgewood Monument (Grade II listed); Talke Conservation Area; the Roman road from Chesterton to Chester; dry stone walling along Crown Bank; listed buildings on Coal Pit Hill; and historic coaching inns</p> <p>Historic England - No nearby designated heritage assets.</p>	
<p><i>Green Belt:</i> Loss of Green Belt land / loss of openness of the Green Belt</p>	

<p><i>Deliverability / Viability:</i> The proposed access is across a ransom strip put in place (by Taylor Wimpey) to prevent the existing estate becoming a through-route / access to this site</p> <p>Site likely to be highly contaminated due to former industrial uses which could affect viability (asbestos found during demolition)</p>	
<p><i>Other:</i> The level of development proposed in the Talke area is not in line with the settlement hierarchy</p> <p>Brown field sites in more urban areas where amenities are better, and infrastructure is already in place should be looked at first</p> <p>Loss of agricultural land</p> <p>Increased risk of disturbance to mine shafts and potential subsidence issues, in particular with the volume and weight of even more traffic</p> <p>No housing need - there is sufficient new housing already available in the area (estate currently under construction on West Avenue only half a mile away)</p> <p>Looks like a rational proposal given the existing infrastructure</p>	
<p>Concerns regarding increase in traffic - increased noise and disturbance, congestion, on-street parking problems, accidents, difficulties with residents getting in and out of driveways and impact on the bus service</p> <p>Existing road system inadequate, in a poor state of repair and unsuitable to accommodate additional traffic – in particular, in the High Street / Crown Bank / Swan Bank thoroughfare, all through the Talke residential road network and the roundabouts at the end of the village</p>	

<p>National traffic audits indicate that the A34 and A500 are already at almost full capacity</p> <p>Increase in heavy vehicles associated with construction works leading to further congestion and potential safety hazards</p> <p>The nearby major arterial routes of the A34, the A500 and the M6 already regularly cause unacceptable traffic difficulties in Talke, causing large numbers of vehicles, including HGVs, to divert through the village when there are accidents on / the M6 is closed. Additional houses will only exacerbate these problems</p> <p>The new housing sites will result in large numbers of people commuting from the sites, which is contrary to the Council's objective 'to reduce the need to travel'</p> <p>Access via Knowles View will mean the Mitchell Gardens estate will become a through-road with an extra 60-100 vehicles a day. Mitchell Gardens was not designed to be a through-road, the roads are already too narrow, and parking is a major problem / access will be difficult with the A34 at capacity</p> <p>Increased competition for / inadequate parking provision at retail outlets in the Talke Pits, Butt Lane and Kildgrove areas Inadequate public transport</p>	
<p>Potential contamination of ground or surface water due to construction on previous mining operations</p> <p>Increased flood risk caused by run-off and damaged pipes from excess traffic</p>	

54. BL8: Land Adj to roundabout West Avenue, Kidsgrove

Summary of Main Issues Raised	Council Response
<p><i>Residential amenity / Health & wellbeing:</i> Impact on air quality - loss of clean fresh air and potential emissions and dust from construction activities that could affect air quality and residents' health (particularly taking into account the elderly population / ex-mining population with high incidences of Asthma and COPD)</p> <p>Impact on the health and wellbeing of the local community - concerns about how the construction projects will affect their access to services and overall quality of life (especially given the village has a high elderly population)</p> <p>Increased noise pollution disturbing the peace and tranquillity of the area</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Social infrastructure:</i> Insufficient / overloaded infrastructure - schools, GP surgeries (Talke and Kidsgrove), NHS dentists and shop/s</p> <p>Loss of open space</p> <p>Suggestion that the former Hilltop School site should be retained in case a school with a playing field is needed</p>	
<p><i>Transportation:</i> Concerns regarding increase in traffic - increased noise and disturbance, congestion, on-street parking problems, accidents, difficulties with residents getting in and out of driveways and impact on the bus service</p> <p>Existing road system inadequate, in a poor state of repair and unsuitable to accommodate additional traffic – in particular, the High Street / Crown Bank / Swan Bank thoroughfare, the junctions and roundabouts at the end of the village and throughout the Talke residential road network</p>	

<p>National traffic audits indicate that the A34 and A500 are already at almost full capacity</p> <p>Increase in heavy vehicles associated with construction works leading to further congestion and potential safety hazards</p> <p>The nearby major arterial routes of the A34, the A500 and the M6 already regularly cause unacceptable traffic difficulties in Talke, causing large numbers of vehicles, including HGVs, to divert through the village when there are accidents on / the M6 is closed. Additional houses will only exacerbate these problems</p> <p>The new housing sites will result in large numbers of people commuting from the sites, which is contrary to the Council's objective 'to reduce the need to travel'</p> <p>Increased competition for / inadequate parking provision at retail outlets in the Talke Pits, Butt Lane and Kidsgrove areas</p> <p>Inadequate public transport</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>Potential contamination of ground or surface water due to construction on previous mining operations</p> <p>Increased flood risk caused by run-off and damaged pipes from excess traffic</p>	
<p><i>Biodiversity:</i></p> <p>Loss of green space, trees, hedgerows and natural habitats to a variety of wildlife (including hedgehogs and bats) = net loss in biodiversity</p> <p>Detrimental impact on nature reserves and ancient woodland</p>	

Request that local wildlife groups and owners of the conservation area be involved in assessing the potential impacts	
<p><i>Character:</i></p> <p>The amount of development proposed is out of proportion with the size of the village and would overwhelm it – adversely affecting the identity and special character of the historic village, rendering it a semi-urban sprawl</p> <p>Detrimental impact on the open landscape, scenic beauty, natural contours and rural setting of the historic village</p> <p>Impact on heritage assets, including the Wedgewood Monument (Grade II listed); Talke Conservation Area; the Roman road from Chesterton to Chester; dry stone walling along Crown Bank; listed buildings on Coal Pit Hill; and historic coaching inns</p> <p>Historic England - No nearby designated heritage assets.</p>	
<p><i>Green Belt:</i></p> <p>Loss of Green Belt land / loss of openness of the Green Belt</p>	
<p><i>Deliverability / Viability:</i></p> <p>Site likely to be highly contaminated due to former industrial uses which could affect viability</p>	
<p><i>Other:</i></p> <p>The level of development proposed in the Talke area is not in line with the settlement hierarchy</p>	

Brown field sites in more urban areas where amenities are better, and infrastructure is already in place should be looked at first

Loss of agricultural land

Increased risk of disturbance to mine shafts and potential subsidence issues, in particular with the volume and weight of even more traffic

Looks like a rational proposal given the existing infrastructure

55. CH13: Castletown Grange, Douglas Road

Summary of Main Issues Raised	Council Response
<p><i>Transportation:</i> Staffordshire County Council - Rationalisation of access arrangement required to support redevelopment of the site (</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Water, drainage & flood risk:</i> Environment Agency - Based upon our Flood Map for Planning, part of the proposed site falls within Flood Zone 3 and 2 of the Ashfield Brook, designated ordinary watercourse. The Brook would appear to go into culvert upstream of the site, with flooding potential resulting from blockage of the culvert. Further assessment / modelling should inform any application for development of this site and a sequential approach taken to the siting of development to ensure it remains out of the high-risk area.</p> <p>Environment Agency - Opportunities for flood risk and ecological betterment / water quality enhancement should be fully investigated and implemented.</p>	
<p><i>Character:</i> Historic England - No nearby designated heritage assets</p>	

56. CH14: Maryhill Day Centre, Willmott Drive

Summary of Main Issues Raised	Council Response
<p><i>Transportation:</i> Staffordshire County Council - Any access off Willmott Court will require off-site highway works to widen the carriageway and improve geometry of turning head.</p> <p>Staffordshire County Council - Access via Wilmot Drive raises no concerns</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Character:</i> Historic England - No nearby designated heritage assets</p>	
<p><i>Other:</i> Existing amenities makes this a sensible proposition</p>	

57. CT1: Land at Red Street and High Carr Farm

Summary of Main Issues Raised	Council Response
National Highways - Further assessment required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would like to be consulted on this.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Staffordshire County Council - Master plan to be supported with a Transport Assessment. The IDP and supporting strategic transport modelling must identify whether off-site highway improvements are required to support the major development. Gateway / speed reduction/ traffic calming scheme will be required on Talke Road to accommodate for change in built up residential area. Sustainable travel links and provision of adequate amenities /facilities and access to public transport to serve the scale of the development key consideration from an accessibility/sustainability perspective. Walking/ Cycling Audit required to demonstrate safe and suitable links are available / can be provided to support the scale of development. Infrastructure improvements required will be fully funded by the applicant.	
United Utilities - Further clarity on point of connection required. In Between UU and ST area of service for wastewater.	
Comment in support of the development by landowner. The rep sets out details of suitability, sustainability and deliverability and attaches a transport assessment.	
The area has many mine shafts. Concerns over subsidence and sinkholes.	
Infrastructure and services are not in place to support such a large development (schools, GPs, shops etc)	
Newcastle is drastically short of smaller houses for either first time buyers to get on the property ladder or older people looking to downsize	
Site contradictory to government statements regarding building on the Green Belt. Exceptional circumstances for Green Belt release has not been proven.	
Red street is edged by A34, A500 and M6 and at times traffic is diverted through Red Street.	

Red Street is narrow lanes and cannot accommodate the vehicle increase from development	
Disruption to residents due to scale of development	
The land is workable farmland/greenbelt with hundreds of mature trees and hedgerows which supports a business	
Abundance of wildlife on the site including European hedgehogs and lapwings which are released onto the site	
Site used recreationally by public	
Site is out of scale and character for the surrounding area	
Lack of public transport in area which will mean increased reliance on cars and therefore more pollution to area – contradictory to sustainable transport policies	
Access constraints at Bells Hollow	
Doubling the population of the area	
Poor drainage in the area.	
Poor impact on residents' mental health.	
Will the homes be affordable?	
Concern about effect of construction vibrations on older homes which are already compromised by traffic, having had tie-bars installed.	
The apartments in Crofters court will look out directly onto the new houses and offer no privacy for the new residents as the upstairs apartments will have a direct view into gardens and buildings.	
Effect on Wedgewood Monument and its setting.	
What is the need to build at Red Street when population is decreasing	
Development should be concentrated in urban areas.	
The site has access constraints and is questionable whether it can be developed.	
CPRE Staffordshire - We oppose the development of this agricultural land in the Green Belt. The fields support populations of snipe, an Amber List species that has undergone population decline in the UK.	
Brownfield sites should be developed first.	

Pollution, including noise and air pollution impacts	
Scale of the proposal is a concern	
Object to development due to impact on local character of the area and village feel	
The site is not sustainable and concerns over climate change impacts	
The site is in close proximity to employment development at Chatterley Valley	
A lot of development has also taken place in the local area	
Concerns over utilities connections including sewage connections	
Drainage and surface water flooding concerns	
Concerns over landscape impacts	
Concerns over construction impacts	

58. CT20: Rowhurst Close

Summary of Main Issues Raised	Council Response
<p><i>Social Infrastructure:</i> Chesterton settlement-wide issues highlighted: Insufficient / overloaded infrastructure - GP surgeries & NHS dentists, schools</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Transportation:</i> National Highways – The site is likely to have an impact on the Strategic Road Network (SRN) in terms of traffic. The immediate SRN junctions likely to be impacted are: AA500 / Alsager Rd; A500 / A34 / Newcastle Road roundabout; A500 / AA527; A500 / A5271. Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.</p> <p>Staffordshire County Council - Development to be supported with a Transport Assessment.</p> <p>Other transport High volumes of traffic within Chesterton, and whenever a road is closed due to road works, the surrounding areas become grid locked.</p>	
<p><i>Character:</i> Historic England - No nearby designated heritage assets.</p>	
<p><i>Other:</i> Considered that this proposed allocation should be extended to include an area referred to as White Rock (1.52ha area defined on a map, with specific developable areas highlighted). Technical reports to highlight the mitigation of ecology and contamination issues on the site are also provided. Arguments made as to open space accessibility improvements</p>	

<p>& the stance on Green Belt. Consequent amendments be made to Policy EMP1 & the Policies Map.</p> <p>Mining legacies.</p> <p>The site is a rational proposal given the existing infrastructure.</p> <p>CT20 is an appropriate employment site, but as it is clearly visible from Apedale Country Park, it should include trees that screen any buildings.</p> <p>Brownfield sites should be exploited to provide affordable housing and prior to developing on greenfield areas.</p> <p>Potential for developments to impact on the water supply, with reference to earlier schemes causing such problems for existing properties.</p> <p>Concerns over loss of biodiversity, impact on wildlife & landscape.</p> <p>Impact on Grade II Wedgewood Monument.</p>	
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59. KG6 William Road, Kidsgrove

Summary of Main Issues Raised	Council Response
<p>Historic England - No nearby designated heritage assets.</p> <p>United Utilities - Sewer passes through this site. In addition, we have noted a modelled risk of sewer flooding.</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>

60. RC8: Land at Liverpool Road

Summary of Main Issues Raised	Council Response
Historic England - Cannot locate site.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
United Utilities - Initial Site Assessment Record of Sewer Flooding in the Vicinity of the Site: RC8 - Land at Liverpool Road (Part of Birchenwood) Kidsgrove (Parcel 2)	
Question over the need for this site to be developed.	

61. KL13: Keele Science Park, Phase 3

Summary of Main Issues Raised	Council Response
<p>National Highways - further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocations (where impacts on the operation of the SRN in the area are anticipated) be subject to consultation with National Highways, and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.</p> <p>The immediate SRN junctions likely to be impacted are M6/J15/A500 (Queensway) / A34 roundabout.</p> <p>Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area.</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p>Natural England - • The site includes areas that are priority habitat- i.e. deciduous woodland, and The Butts and Hands Wood which it is listed as Ancient & Semi-Natural Woodland.</p> <ul style="list-style-type: none"> • Potential for air quality impacts on designated sites. • Potential impact on best and most versatile land. 	
<p>Site KL 13 is not in the Green Belt and is understood to deliver the identified need for Keele. As such, the Council have concluded that no further sites are required in Keele or the surrounding area during the plan period and hence no additional Green Belt release is necessary. Consider this to be an unsound approach as it does not follow the legal and procedural requirements of a sound plan which should be positively prepared, effective, justified and consistent with national policy, in particular identifying appropriate sites to endure over the whole plan period (NPPF paragraph 35). By selecting KL 13 in isolation, the strategy for delivery of development in Keele is not robust. Whilst we acknowledge that the NPPF seeks to protect Green Belt land as a matter</p>	

<p>of principle, new Local Plan documents must plan appropriately and ensure that Green Belt release creates robust and defensible boundaries for the future. In our view, the Councils proposed approach to allocate just one site in this locality for the entire plan period would leave the Local Plan in a perilous position, at risk of challenge and speculative future development to meet need at a later date</p>	
<p><i>Social infrastructure:</i> Existing pressures on schools (across the age ranges) & medical facilities (including GP & dental services) will be exacerbated significantly.</p> <p>The Local Plan must provide greater clarity on how the local infrastructure will be improved as a consequence of development.</p>	
<p>Staffordshire County Council – Masterplan to be supported with a Transport Assessment & Travel Plan.</p>	
<p>Transportation Should development occur, whilst there may be some capacity on existing bus services, there is going to be a requirement for additional services. If there is a proposed link road through to Keele university from site TB19, there could be an opportunity to provide a joined up public transport system which could serve the majority of new sites in and around Keele, thus providing a good sustainable option for local residents.</p> <p>Plans should take on board the need to create a more accessible and inclusive Public Transport Network, moving away from the East/West lineage of the existing system, and using the Local Plan to open up links to the North and South of Keele University, supporting more circular public transport solutions that link the Urban Villages to core employment sites and amenities.</p> <p>A through road from KL13 should not be created, as it would encourage vast amounts of traffic from the Keele sites (as well as the university) to</p>	

<p>and from the M6, for example, via Sutherland Drive and other roads in the Westlands area.</p> <p>The roads are already struggling to meet current needs and will not cope with the extra properties and people planned for this area.</p>	
<p><i>Character:</i> Historic England – Whilst unclear on the exact site location, potentially there are no nearby designated heritage assets.</p>	
<p><i>Deliverability:</i> Keele University is committed to working with the Council and other stakeholders in bringing forward the allocated site as an exemplar of sustainable development.</p> <p>The University agrees that development should be masterplan led and should maximise the benefit of sustainable transport links and the Smart Energy Network Demonstrator and is fully committed to working with other landowners to realise these objectives.</p>	
<p>Keele Parish Council – support Keele University's growth plans, and the details outlined in the University masterplan. As such, they are in favour of the continuing development of the existing Science Park (KL13) to support employment, and to bring high skilled jobs to the area.</p>	
<p><i>Other:</i></p> <p>Developing KL13 would seem sensible if absolutely required to meet housing and business needs, recognising that it is already partially developed. The close proximity of the observatory could be a negative aspect, however.</p> <p>The University contends that there would be limited conflict with the five purposes of Green Belt identified in the NPPF. Keele is a village, and the</p>	

proposals would not therefore involve the sprawl of a large built-up area or the coalescence of existing towns. The proposals involve a limited release of countryside which is clearly defined and viewed in the context of existing built development to the east and west. This is not a valued landscape for the purposes of the NPPF. The proposals will not affect the historic core of Keele Village and will not prejudice urban regeneration within Stoke on Trent, which has its own separate employment allocation. This approach is considered far more sustainable than pushing the Borough's employment and housing requirements to settlements outside the Green Belt, which are significantly less well equipped to deal with the pressures that it brings. Although there may be arguments for an equal distribution of opportunity, consideration needs to be given to the wide impact of a distributed solution. Focusing development around existing infrastructure which can be sustainably enhanced to support both housing and economic growth should be given priority.

By selecting KL 13 in isolation, the strategy for delivery of development in Keele is not robust. Whilst acknowledging that the NPPF seeks to protect Green Belt land as a matter of principle, new Local Plan documents must plan appropriately and ensure that Green Belt release creates robust and defensible boundaries for the future. It is considered that the Council's proposed approach to allocate just one site in this locality for the entire plan period would leave the Local Plan in a perilous position, at risk of challenge and speculative future development to meet need at a later date.

Development offers a generational opportunity for regional scale growth which could provide a step-change in the Borough's employment offer that supports the knowledge-economy and which will significantly increase job numbers, job quality and job choice. However, the growth of Keele University and its Science Park must be supported by a sustainable spatial strategy. This must include the release of further land in the University Growth Corridor.

<p>The site being near two deciduous woods which it is suggested will likely contain bats (a protected species), with other wildlife impacts highlighted. Increase in traffic during & after construction. Impacts on existing residents including mental health & wider amenity concerns. The science park is considered to have expanded enough already.</p> <p>This site is one identified (amongst others in the locality) whose development could impact upon Thistleberry.</p> <p>Wider issues argued include: The concentration of housing in Keele is disproportionate to its scale; the number of recent permissions granted; development of Green Belt land will result in Silverdale and Keele merging into one large urban conurbation; proximity to Walley's quarry with associated air quality & pollution issues; natural springs being found; the number of empty homes in the Borough & student blocks within the university campus itself; vacant & derelict buildings in the town centre; reduced population figures in the 2021 census; Government statements on areas that should be the focus of development; recreational, biodiversity & public health value of Keele golf course in particular; covenants may restrict/limit development; increased carbon emissions impacts; contesting the Local Plan's sustainability appraisal assessments.</p>	
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62. KS11: Knutton Community Centre

Summary of Main Issues Raised	Council Response
<p><i>Social infrastructure:</i> Insufficient / overloaded infrastructure - GP surgeries and NHS dentists</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Transportation:</i> Staffordshire County Council - Access Improvement scheme may be required to support redevelopment at the site.</p>	

Staffordshire County Council - Development to be supported with a Transport Statement.	
<i>Water, drainage & flood risk:</i> Concern regarding flooding at Lower Milehouse, 'the Whammy' open space and Black Bank	
<i>Character:</i> Historic England - No nearby designated heritage assets	
<i>Deliverability:</i> Aspire Housing confirm that it is their intention to submit a planning application for the affordable housing units on the site (& others within the Knutton Masterplan by the end of 2023).	
<i>Other:</i> The site is a rational proposal given the existing infrastructure. Derelict & unfinished sites in Newcastle town centre and previous plans for regeneration not coming to fruition.	
Concerns regarding increase in traffic Existing road system already poorly maintained, with the new 'Wilmot Drive' estate still having no footpaths or tarmac on the roads.	

63. KS17: Knutton Recreation Centre

Summary of Main Issues Raised	Council Response
<i>Social infrastructure:</i> Insufficient / overloaded infrastructure - GP surgeries and NHS dentists	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
<i>Transportation:</i> Concerns regarding increase in traffic Existing road system already poorly maintained, with the new 'Wilmot Drive' estate still having no footpaths or tarmac on the roads.	
<i>Water, drainage & flood risk:</i>	

Concern regarding flooding at Lower Milehouse, 'the Whammy' open space and Black Bank	
<i>Character:</i> Historic England - No nearby designated heritage assets	
<i>Deliverability:</i> Aspire Housing confirm that it is their intention to submit a planning application for the affordable housing units on the site (& others within the Knutton Masterplan by the end of 2023).	
<i>Other:</i> Greenspace impacts, which would include loss of playing fields and other village amenities. Implications such as recreational use demands increasing for other areas in the locality, such as KS3, if this site were to be developed. If the scale of housing planned elsewhere (such as Keele golf course) is reduced, both sides of Blackbank road, on the edge of Knutton, could be used to meet the Borough's needs. The previously proposed plan of a village centre beside the High Street, adjacent to KS17, should be progressed. Derelict & unfinished sites in Newcastle town centre and previous plans for regeneration not coming to fruition.	

64. KS18: Land North of Lower Milehouse Lane

Summary of Main Issues Raised	Council Response
<i>Social infrastructure:</i> Insufficient / overloaded infrastructure - GP surgeries and NHS dentists	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at
<i>Transportation:</i> Staffordshire County Council - Access via High Street only	

Staffordshire County Council - Redevelopment will result in the loss of community car park which may result in overspill of vehicles parking on street giving rise to a highway safety issue.	Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Staffordshire County Council - Development will need to be supported with a Transport Note / Statement to consider this concern in detail.	
<i>Water, drainage & flood risk:</i> Concern regarding flooding at Lower Milehouse, 'the whammy' open space and Black Bank	
<i>Character:</i> Historic England - No nearby designated heritage assets	
<i>Deliverability:</i> Aspire Housing confirm that it is their intention to submit a planning application for the affordable housing units on the site by the end of 2023	
<i>Other:</i> Looks like a rational proposal given the existing infrastructure Concerns regarding increase in traffic Existing road system already poorly maintained, with the new 'Wilmot Drive' estate still having no footpaths or tarmac on the roads	

65. KS19: Knutton Lane

Summary of Main Issues Raised	Council Response
Concern over loss of garages / car park as they are used and valuable resource to local residents.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at
Concern that removal of car park will raise highway safety concerns with more on street parking.	
Concern that trees would need to be removed to enable development.	

Concerns over the ability for existing local services and infrastructure to cope with new demand.	Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Concern over increase to traffic and the ability of the existing road network to cope.	
Historic England - No designated heritage assets in the nearby location of this road.	
The proposed allocations that Aspire Housing have an interest in are as follows: KS11, KS17, KS18, KS19, delivering a total of 73 affordable dwellings. Aspire are currently working up planning applications for some of these sites.	

66. KS3: Land at Blackbank Road

Summary of Main Issues Raised	Council Response
Concern over the loss of valuable, well used recreational space for children, dog walkers, runner etc. The need is exasperated by the closure of the Rec Centre.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Support for the development of Knutton centre and provision of a village centre.	
Support to develop in the Green Belt further along Blackbank Road and retain this for recreation.	
Concerns over the ability for existing local services and infrastructure to cope with new demand.	
Concern over increase to traffic and the ability of the existing road network to cope.	
Staffordshire County Council - Development will need to be supported with a Transport Assessment. Speed Measurement survey on Blackbank Road will need to be undertaken due to speeding concerns.	
Historic England - No designated heritage assets in the nearby location of this road.	
Concerns that removal of the green space will exasperate existing major issues with flooding.	
Concerns over loss of habitat and impact on wildlife.	
Sport England - We are opposed to housing allocations on playing field sites, as they are not proven surplus to requirement or replacement provision is needed. They suggest that any loss of playing field sites should be informed by an updated Playing Pitch Strategy to determine if they should be retained to meet demand. If there is no quantitative need for the playing field land, mitigation may be needed to fund qualitative improvements. Sport England believes the policy is inconsistent with national planning policy and recommends that site-specific requirements include playing field sites require compliance with NPPF paragraph 99. KS3 Land at Blackbank Road - Site has been marked out (2 x adult 11v11 and 2 x Youth 11v11) and utilised by teams within the last 5 years and	

<p>identified within the Council's Playing Pitch Strategy with a site recommendation to protect and enhance. Site identified within a sub area where there is a future shortfall in provision for football, rugby and with cricket at capacity.</p>	
<p>Aspire does not control KS3, however Aspire would be interested in delivering this site as either the sole developer or as an affordable housing partner to a private developer.</p>	

67. LW53: Land Corner of Mucklestone Wood

Summary of Main Issues Raised	Council Response
Loggerheads is overdeveloped and has not seen an investment in infrastructure to accommodate (schools, bus links, doctors etc)	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Loggerheads is woefully under provided for in sports and recreational facilities. There is no NEAP or MUGA or community centre.	
Poor visibility at Mucklestone Wood Lane wood make junction dangerous	
Why does Loggerheads need to contribute such a large number of dwellings in the Local Plan (15% when the ward only represents 3.5% of the population)?	
Already houses being constructed and not sold- is there a need in Loggerheads?	
Site is against Loggerheads neighbourhood plan as would create harm to the character and rural landscape	
Site consists as best and most versatile agricultural land	
Increase in housing without proper employment or sustainable transport links closeby increases car use in loggerheads which increases pollution.	
Policy IN2 –a, b, c, e f cannot be applied to Loggerheads	
Previously described as unsuitable in SHELAA 2022 document – what has changed?	
Currently outside the village envelope.	
Similar arguments as Baldwins Gate so how can LW53 be accepted?	
NULBC are working with Shropshire Homes regarding LW53	
Lapwings are a protected species and use the land, so do bats.	
Sewage Treatment works are over capacity and are prone to flooding with heavy downpour	
Will there be any footpaths to safely connect pedestrians to the village centre?	
Only small numbers of additional homes on infill sites in Loggerheads should be allowed.	

<p>Stafford Borough Council - The proposed housing allocation at Loggerheads (LW53) could increase traffic on the B5026 towards Eccleshall and Stafford. Further information on this matter would be welcomed.</p>	
<p>Environment Agency - This site is also underlain by a Principal aquifer and is situated within SPZ3 (Bearstone abstraction) so is also within a sensitive location for controlled water receptors. SPZ3 is the area around a supply source within which all the groundwater ends up at the abstraction point. Therefore, any development that is proposed within this area will need to prevent deterioration of the abstraction source and protect controlled water receptors.</p>	

68. LW87: Former Petrol Station, Eccleshall Road

Summary of Main Issues Raised	Council Response
Loggerheads Parish - Due to its central location, LW87 should be retained as an employment site	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
The site is underlain by a Principal aquifer and as its former land use is as a petrol station, any development would pose a high risk of pollution to controlled water receptors, in particular the groundwater. In addition, this site is situated adjacent to the Burnt Wood SSSI, which is a groundwater dependant terrestrial ecosystem and therefore, sensitive to changes in groundwater flow and quality.	
Would be suitable as a community facility	
Car parking issues along Eccleshall Road will be worsened with the development	
Air pollution levels from standing vehicles waiting to negotiate this junction are high which makes this site unsuitable for residential development	

69. MD29: Land North of Bar Hill

Summary of Main Issues Raised	Council Response
Bar Hill has poor drainage - this has not been addressed.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Car park along Bar Hill making it more like a single road, there is also heavy agricultural machinery along the road regularly- the additional housing will add to the dangers already presented on this road	
Staffordshire County Council - Critical junctions identified may trigger the requirement for off-site highway mitigation works which will need to be fully funded by the applicant.	
Staffordshire County Council - Transport assessment required	
<p>Madeley Parish Council - The road network. There are two particularly dangerous elements of the road network, both of which are highlighted in the Neighbourhood Development Plan for Madeley. These are the junctions between Manor Road and Bar Hill and the Monument Junction between Keele Road and Newcastle Road. Any large-scale development within Madeley Parish would, by virtue of the contingent increase in road network usage, require significant upgrading to the junctions in question to ensure road safety was not compromised. It is for that reason that policy TRA1 in the Madeley Neighbourhood Plan requires this as a material consideration when considering potential housing developments.</p> <ul style="list-style-type: none"> • The school system. All of the local schools from the two primary schools to the Secondary school are, already, oversubscribed. A further 150 houses would be likely to see an influx of 200 to 300 children into an already oversubscribed system. Consideration would need to be given to how these children can be appropriately educated within the current limited bounds. • Drainage supplies. The local drainage supplies are, we understand, also already at or close to capacity. Consideration would need to be given and appropriate provisions incorporated as to how this could be expanded and accommodated for with an increase in housing provision. 	

<p>• Additional considerations which would also need to be provided for include the already oversubscribed Doctors surgery, Dentist provision and limited range of local stores and other facilities.</p> <p>The Parish Council are, also, concerned to ensure that the relevant housing need is met. The trend within Madeley Parish has been for developments of larger family houses to be constructed and provided for ownership and/or shared ownership schemes in respect of the provision for affordable housing elements. The Parish Council consider that the housing need in the area is for increased availability of social rental properties as families are finding themselves forced to leave the area due to a lack of availability of suitable properties which is detrimental to the development of family units within the Parish boundaries.</p>	
<p>There are many comments regarding HS2 – are these still necessary to include?</p>	
<p>Agricultural land which can be put to better use than housing in Madeley</p>	
<p>Ownership Issues - the site is under the control of multiple landowners. This brings significant issues in relation to deliverability, as if even one of the landowners is resistant to the development, this can make the scheme unviable or prevent it coming forward altogether</p>	
<p>Infrastructure constraints in Madeley to accommodate an additional 150 houses (Schools,GPs etc).</p>	
<p>Bar Hill is separate from the rest of the village, so the site does not have good access to services and facilities.</p>	
<p>Madeley neighbourhood plan is specific in its aims to - maintain the much-valued rural feel of the parish, its distinctive historic character, the countryside setting and key views within the conservation area- this proposal contradicts this.</p>	
<p>Staffordshire County Council - The existing pedestrian footbridge over the railway line provides a more direct pedestrian route to the centre of Madeley where facilities and amenities are located. However, the</p>	

<p>footbridge is of substandard width and condition to support major development</p>	
<p>There is no bus service supplying Bar Hill so people on MD29 will have to have a car to get about which contradicts policies around sustainable transport usage.</p>	
<p>Brownfield site of Madeley Manor should be considered before Green Belt</p>	
<p>Also, many of us bought houses on the assurance the land would not be built on because it was near to HS2.</p>	
<p>Support - A mini roundabout at Madeley A525/A531 junction would reduce many problems including air pollution at Meadows School.</p>	

70.NC13: Land west of Bullockhouse Road

Summary of Main Issues Raised	Council Response
<p><i>Residential amenity / Health and wellbeing:</i> Loss of privacy, light / overshadowing, outlook and visual amenity</p> <p>Additional noise and dust associated with construction / construction vehicles</p> <p>Additional cars significantly increasing emissions / reduction in air quality</p> <p>Increased pollution (air, light and noise), all having a detrimental impact on the physical and mental health / wellbeing of residents</p> <p>Unclear where the local authority's targets to achieve clean air has been factored into the proposals / impact on the Air Quality Management Plan</p> <p>Increased air pollution adversely affecting the development of local children</p> <p>Increased odour from Walley's Quarry because of more waste being sent there</p> <p>Loss of green space would have a detrimental impact on the physical and mental health / wellbeing of residents (including obesity rates)</p> <p>[Loss of private views / devaluation of property]</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Social infrastructure:</i> Loss of open green / recreational space – the site, which enhances the natural and open setting of the adjacent children's playground, is used by many locals for recreational purposes making; public paths around the site enable local residents to observe wildlife and plant-life close-up</p>	

<p>The public footpath along the northern edge of the land would still enable locals to exercise and access the play area (there is no public access over the site itself)</p> <p>Insufficient infrastructure – doctors, dentists, nursery and school places are already oversubscribed; no banks, post office, shops (the closest are over a mile away), insufficient open spaces, leisure facilities and jobs</p> <p>Harriseahead school could be expanded but only by building on the playing field or the all-weather playground</p>	
<p><i>Transportation:</i></p> <p>Staffordshire County Council – Any Master Plan will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority and a Travel Plan</p> <p>Staffordshire County Council – Footway improvements required along the site frontage</p> <p>Staffordshire County Council – Bus services limited therefore may require S.106 Contribution toward bus service improvements</p> <p>Other comments relating to transport from other parties</p> <p>The roads in the area, which are narrow with bad bends, in poor condition and often without pavements, were not designed for the type and volume of traffic they already carry (cars, HGVs, buses, tractors etc) and are already dangerous, with many residents already not able to exit their drives safely</p> <p>Bringing additional cars onto the local network (150-200 or 400-500 when combined with NC77), including construction-related vehicles, will increase congestion, noise, pollution, disturbance and reduce road safety</p>	

Existing traffic issues in the area include the junction of Pennyfields / High Street onto Bullocks House Road (hazardous bottleneck on a dangerous bend), Long Lane (rat-run), Bull Lane (rat-run), Colclough Lane (rat-run) and the roundabout at the end of Turnhurst Road (backed-up from Chell)

The site is close to Thursfield Primary school which has very little parking is and becomes grid-locked at drop-off and pick-up times, with local pinch points, at the top of Pennyfields Road, through Newchapel village centre and past the school towards Long Lane / Chapel Lane, causing long tailbacks / delays

Thursfield school is located opposite a virtual blind junction without pavements and the additional traffic in conjunction with the current heavy load would give great concern for serious accidents (in July 2023 a school child was injured in an accident)

Concern regarding site access – roads narrow and difficult to see oncoming traffic, resulting in an unacceptable increase in risk to school children and other pedestrians

The site is perfect for development, having direct access onto a straight stretch of main road

Inadequate public transport – poor local bus services and Kidsgrove railway station a two-mile walk away – all resulting in reliance on cars

Lack of support for public transport – insufficient bus shelters, inadequate parking at and closing of the ticket office at Kidsgrove railway station

Inadequate other sustainable transport modes – lack of pavements and safe routes for cyclists and horse riders

<p>A traffic survey must be undertaken at a time to provide an accurate representation of the existing levels of congestion (i.e. during term-time)</p> <p>Roads already hazardous in winter due to elevation / poor weather conditions (snow), particularly Pennyfields Road, which is very steep</p> <p>Insufficient school places locally will lead to children travelling further afield – resulting in more traffic on the roads</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>United Utilities – Various sewers pass through this site. There is a record of sewer flooding in the vicinity of the site, and we have noted a modelled risk of sewer flooding on the site</p> <p>Other comments on water, drainage and flood risk from other parties</p> <p>Negative impact on watercourses / water quality – the local sewage works is already often at capacity, sometimes leading to discharge into watercourses</p> <p>The local sewer system and road drainage on Bullocks House Road and High Street is old and already struggling to cope with rainwater-run off without any further capacity added; history of surface water flooding at Ian Road, Long Lane and Willowcroft Way in HARRISEAHEAD</p> <p>The site facilitates natural drainage, and its development would increase flood risk due to ‘run-off’</p> <p>The site is marshland and unsuitable for building – it is known to flood and there is regularly water lying on its surface following rainfall; it also potentially has an underground lake beneath it (it was historically used to collect water for coal slurry and the water never ran out)</p>	

<p>The site is at a lower level than Bullocks House Road and so may require a pump for drainage</p>	
<p><i>Biodiversity:</i> Loss of trees and green space, resulting in diverse wildlife / habitat loss – a range of insects (butterflies, bees, ladybirds, wasps, dragonflies), bats, birds (sky larks, partridges, falcons, tawny/barn owls, kestrels, sparrowhawk, buzzards, kites) and mammals (squirrels, hedgehogs, rabbits, foxes, badgers)</p> <p>Loss of a natural wetland / marshland, which holds water in the spring and autumn, forming several small ponds that host a self-contained ecosystem of rare amphibious wildlife (crested newts, toads, frogs, lizards, grass snakes)</p> <p>Loss of a fine example of an established English meadow (95% of which have been lost), containing a wealth of biodiversity that is classed as ‘climax vegetation’, including rare native flora (wild orchids, yellow rattleweed, vetches and over 20 different / rare grasses)</p> <p>Loss of established English oak trees and ancient hedgerows which potentially are / should be protected under the Hedgerows Regulations 1997</p> <p>Concern that an up-to-date ecological survey has not been carried out</p> <p>Loss of carbon storage, cooling and shading, green network / opportunities for species migration, the protection of water quality and natural management of flood risk</p> <p>Attention drawn to Section 40 of the Natural Environment and Rural Communities Act 2006 – duty for local authorities to consider conserving biodiversity as an integral part of policy and decision-making</p>	

<p>Fake / new nature areas will be required to replace the natural ones being destroyed</p> <p>The site should be preserved as a wildlife / conservation area</p> <p>No habitat loss within 400 metres of the site</p>	
<p><i>Character:</i> Scale of development out of keeping with the semi-rural character of the village</p> <p>Out of character with the immediate area, which comprises development along Bullocks House Road which is only one to two houses deep</p> <p>Erosion of local character – the gap provided by NC13 helps to denote the historic village and character of the area – the sense of moving from one village to another. Loss of this space would have a detrimental impact on the special character of each village, resulting in housing approximately 2 miles long from Turnhurst Road to Chapel Lane and an unbroken conurbation / urban sprawl from Tunstall and all the Potteries towns, all the way to Mow Cop, with the outlying villages swallowed-up</p> <p>The character and appearance of the land and the separation between Newchapel and Harriseahead would be lost forever</p> <p>Loss of the sense of space and place afforded by the countryside view across NC13 towards Wales, which is extremely important to local people and indicates the transition as you travel north into a more agricultural / rural landscape</p> <p>Loss of character and quality of the countryside – the only real piece of greenbelt land adjacent to the road</p> <p>Detrimental impact on the small close-knit / community feel of the village</p>	

No intrusion into the open countryside, as the site is an infill site within the village – the Green Belt boundary has already been breached with residential building on the eastern side of Bullocks House Road

The land is no use for farming and is poorly maintained – having only been used for grazing, dumping garden waste and fly-tipping / sensitive development could enhance the appearance of the area

Historic England – No nearby designated heritage assets

Green Belt:
'Major' harm to the Green Belt

The site delivers a 'moderate' contribution to the Green Belt; therefore, its loss would be detrimental to the area and would negatively affect the natural landscape

The Green Belt is there to protect villages from urban sprawl, removal of areas such as this will undermine rural communities and village life by merging villages and making them part of one large sprawl of houses from Chell / Packmoor to HARRISEAHEAD / Mow Cop

No exceptional circumstances exist to justify the loss of Green Belt land in this location / inadequate justification provided, particularly if based on out-of-date data (i.e. housing need); exceptional circumstance has a narrative re. well-served by public transport, which this site is not

Government policy is to not remove land from the Green Belt for house building

Green Belt is Green Belt for a reason and should never be built on

<p>Building on Green Belt land is unethical in a time of climate change – we need more Green Belt areas, not less</p>	
<p><i>Deliverability:</i> The site is listed as not deliverable or developable in the 2022 SHELLA report</p> <p>Potential remediation works to mitigate historic contamination (mining, dumping of red ash) may make the development unviable</p> <p>The landowner has no intention of selling or developing the field</p> <p>The landowner would be happy for it to be developed for housing to improve the area</p>	
<p><i>Other:</i> Brownfield sites in Newcastle-under-Lyne (some of which are owned by the Council) should be developed instead, which are more suitable and would deliver positive benefits for the community, particularly disused factory sites, which appear destitute in places</p> <p>Greenfield / Green Belt sites chosen as they are the cheapest to build on</p> <p>No local housing need – based on inaccurate / out-of-date data; the population of the Borough is falling; there are many vacant homes in the Borough; many additional homes built in the area in recent years available for sale</p> <p>Concern regarding safeguarding of the adjacent ‘Newcastle Way’</p> <p>Development contrary to the government’s aspirations regarding sustainability and climate change with an emphasis on green spaces</p> <p>Limited (if any) employment within walking or cycling distance and very little in the way of public transport</p>	

<p>Loss of agricultural land / reduction in food production capacity</p> <p>The necessary infrastructure to support the development will lead to more building / loss of countryside</p> <p>None of the advantages of urbanisation will be delivered – employment, improved transportation and educational opportunities etc</p> <p>Site may be contaminated – land in and around previously used for mining and the site itself was used for the historic dumping of red ash</p> <p>Appears to be a ‘done deal’ and thus a waste of time objecting to</p> <p>There has not been a lot of development in this area, and this would provide much needed local housing</p> <p>Sustainable location – with a primary school within walking distance and a short commute to Kidsgrove train station</p> <p>Part of the site has been granted planning permission in the past</p> <p>Request for a further Call for Sites to find more suitable sites (COVID caused a lot of distraction for lots of reasons)</p>	
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71. NC77 Bent Farm, Newchapel

Summary of Main Issues Raised	Council Response
<p><i>Residential amenity / Health and wellbeing:</i> Loss of privacy, light / overshadowing, outlook and visual amenity</p> <p>Additional noise, dust, light pollution and disturbance associated with construction / construction vehicles</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at</p>

<p>Additional cars significantly increasing emissions / reduction in air quality</p> <p>Increased pollution (air, noise and light), all having a detrimental impact on the physical and mental health / wellbeing of residents (including respiratory conditions)</p> <p>Increased air pollution, including potentially hazardous gases and dust released from old mine workings adversely affecting residents, in particular, children</p> <p>Unclear where the local authority's targets to achieve clean air has been factored into the proposals / negative impact on the Air Quality Management Plan</p> <p>Increased odour from Walley's Quarry because of more waste being sent there</p> <p>Loss of green space would have a detrimental impact on the physical and mental health / wellbeing of residents (including obesity rates)</p> <p>[Devaluation of property]</p>	<p>Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Social infrastructure:</i></p> <p>Loss of open green / recreational space – the footpaths that cross the site enable it to be used by many local people for recreational purposes and to observe wildlife and plant-life close-up</p> <p>Insufficient infrastructure – doctors, dentists, chemists, nursery and school places are already oversubscribed; no banks, post office, shops, insufficient open spaces, leisure facilities and jobs</p> <p>Harriseahead school could be expanded but only by building on the playing field or the all-weather playground</p>	

The health and wellbeing of residents will not be compromised as there are many cycle and walking routes near the site which lead to Bathpool Park, Westport Lake and Hanley Forrest Park via tracks / the canal

There are sufficient primary and secondary schools in the area, many of which are already in decline in terms of numbers / undersubscribed

Local doctors are undersubscribed and there are additional rooms in the surgery to accommodate additional practitioners, if required

Site immediately opposite a local medical centre, pub and pharmacy, with Packmoor Ormiston Academy (primary school) and the Packmoor Community Hall within a five-minute walk

The development would deliver new local services and facilities (a parade of units to include a convenience shop) and contributions to enhance existing services, creating a new / strengthened Local Centre

The possibility of new local shop/s (including, possibly, a cafe) within walking distance of local residences would be a welcome addition, would reduce car reliance and would benefit those who cannot walk very far or who do not drive

Transportation:

Staffordshire County Council – Any Master Plan will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority and a Travel Plan

Staffordshire County Council – Access available via Newtown

Other transport comments from other parties

The roads in the area, which are narrow with bad bends, in poor condition and often without pavements and with cars parked along them, were not designed for the type and volume of traffic they already carry (cars, HGVs, buses etc) and are already dangerous, with many residents already not able to exit their drives safely

Bringing additional cars onto the local network (up to 400-500 if combined with NC13), including construction-related vehicles, will increase congestion, noise, pollution, disturbance and reduce road safety, particularly around the local schools (there have been several accidents involving school children in the area recently)

Colclough Lane / Birchenwood / Station Road is a county lane with several blind bends and is already in the top 5% most dangerous roads within Staffordshire, having seen 5 road traffic accidents since January 2023 that have required police presence. Thursfield Road [Newtown], which runs along the other side of the site, is also very busy

There are several bottlenecks around the area, including around Thursfield school, Pennyfields Road, Long Lane (rat-run), Bull Lane (rat-run), Colclough Lane (rat-run) and the roundabout at the end of Turnhurst Road, which is regularly grid-locked

Ormiston Academy now has their entrance onto Turnhurst Road, with children being dropped-off, picked-up and walking on an extremely busy road

Roads in the area are not dangerous

There are no more road accidents on the roads near the site than in the wider area generally and more houses locally will encourage more children to walk to school, thus alleviating some of the traffic issues caused by school runs

Access to the site is difficult and unsafe, with sharp bends on the local road (Station Road). The 2022 SHELLA report notes that the site has constrained access

The site has a 100m+ frontage onto Turnhurst Road with 3 existing vehicular accesses to the site, which have been used for years with no problems. Turnhurst Road is a main road with footpaths on both sides and is not usually used for parking related to the schools in the area

Inadequate public transport – poor local bus services and Kidsgrove railway station a long walk away – all resulting in reliance on cars

Lack of support for public transport – insufficient bus shelters, inadequate parking at and closing of the ticket office at Kidsgrove railway station

Newtown and Turnhurst Road forms part of one of the area's main bus routes and there is a bus stop directly opposite the site

There are safe cycle routes around the area leading from the site to many local towns (Tunstall, Burslem, Kidsgrove, Hanley, Westport Lake and Peacocks Hay) which would minimise car use

A traffic survey must be undertaken at a time to provide an accurate representation of the existing levels of congestion (i.e. during term-time)

Roads already hazardous in winter due to elevation / poor weather conditions (snow), particularly Pennyfields Road, which is very steep

Insufficient school places locally will lead to children travelling further afield – resulting in more traffic on the roads

Water, drainage & flood risk:

<p>Negative impact on watercourses / water quality – the local sewage works is already often at capacity, sometimes leading to discharge into watercourses</p> <p>The site is marshy and facilitates natural drainage – its development would increase flood risk due to ‘run-off’</p> <p>Concern regarding contamination of water from disturbed mine workings</p>	
<p><i>Biodiversity:</i></p> <p>Loss of trees and green space resulting in diverse wildlife / habitat loss – insects (rare butterflies, bees, ladybirds, wasps), bats, birds (blackbirds, sparrows, blue tits, bullfinches, chaffinches, robins, swallows, skylarks, pheasants, partridges, owls, kestrels, sparrowhawk, buzzards) and mammals (moles, rabbits, squirrels, hedgehogs, foxes, badgers)</p> <p>The area itself has a small pond and a small brook running through it, which attract a variety of wildlife (great crested newts, frogs, toads, dragonflies, herons' coots and ducks)</p> <p>Loss of oak trees and a substantial stretch of ancient hedgerow, which contains rare woodland species and is potentially / should be protected under the Hedgerows Regulations 1997</p> <p>Loss of wild English meadow (95% of which have been lost), containing a wealth of biodiversity that is reaching ‘climax vegetation’ stage, including rare native flora (wild orchids, foxgloves, rosebay willowherb, yellow rattleweed, vetches and over 20 different / rare grasses)</p> <p>Ecological survey not sufficiently up to date to reflect the true biodiversity of the site</p>	

Loss of carbon storage, cooling and shading, green network / opportunities for species migration, the protection of water quality and natural management of flood risk

Attention drawn to Section 40 of the Natural Environment and Rural Communities Act 2006 – duty for local authorities to consider conserving biodiversity as an integral part of policy and decision-making

The site has re-wilded and is high in biodiversity – replacement ecology areas on a developed site would not adequately compensate for the natural ecology of the site being destroyed

The design approach will create an environment that contributes to the achievement of the Council’s climate change objectives (Policy CRE1)

Areas of green space, defensible borders and the pond on the site could be retained to accommodate wildlife

Character:

Scale of development out of keeping with the semi-rural character of the villages (Packmoor and Newtown)

Erosion of local character – the gap provided by NC77 helps to denote the historic villages and character of the area – the sense of moving from one village to another. Loss of this space would have a detrimental impact on the special character of each village, resulting in the merging of Packmoor and Newchapel and housing approximately 2 miles long from Turnhurst Road to Chapel Lane and an unbroken conurbation / urban sprawl from Tunstall and all the Potteries towns, all the way to Mow Cop, with the outlying villages swallowed-up

Loss of the sense of space and place / will not preserve and enhance the special character of the individual villages

<p>Loss of the character, appearance and quality of the countryside</p> <p>The land has been abused and neglected over the years (used as a dog toilet and dumping ground) and its development could enhance the appearance of the area</p> <p>Historic England – Cannot locate site but no designated heritage assets in the vicinity of Newchapel</p>	
<p><i>Green Belt:</i></p> <p>Stoke-on-Trent City Council – The site allocation is adjacent to the shared boundary between our respective Councils. In the Green Belt Assessment (2020), the site is contained within parcel 18 which spans both Councils. The current site boundaries do not appear to have been assessed further in terms of the impact upon the Green Belt purposes including preventing neighbouring towns merging. Stoke-on-Trent City Council would therefore like to raise concerns about the inclusion of the site without full consideration of how the site will impact upon the Green Belt and the City.</p> <p>Comments from other parties include</p> <p>‘Major’ harm to the Green Belt</p> <p>The site delivers a ‘moderate’ contribution to the Green Belt; therefore, its loss would be detrimental to the area and would negatively affect the natural landscape</p> <p>The Green Belt is there to protect villages from urban sprawl, removal of areas such as this will increase / consolidate urban sprawl, with the villages of Packmoor, Newton, Newchapel and Harriseahead merging from Chell / Packmoor to Harriseahead / Mow Cop</p>	

No exceptional circumstances exist to justify the loss of Green Belt land in this location / inadequate justification provided, particularly if based on out-of-date data (i.e. housing need); exceptional circumstance has a narrative re. well-served by public transport, which this site is not

Government policy is to not remove land from the Green Belt for house building

Building on Green Belt land is unethical in a time of climate change – we need more Green Belt areas, not less. How will the loss of Green Belt be compensated for?

Overall the site makes a 'weak' contribution to the function of the Green Belt – it does not play a role in checking the unrestricted sprawl of large built-up areas (Tunstall and Kidsgrove are both two miles away); it has strong defensible boundaries on all sides (roads or existing residential development); it could be considered small-scale infilling / the logical conclusion of the settlement; it does not play a role in safeguarding the countryside against encroachment (it is primarily scrubland with some previously developed land – the site of the former Packmoor Working Men's Club and lock-up garages); it does not play a role in preserving the setting / special character of an historic town

The site represents a minor release of land from the Stoke-on-Trent Green Belt (0.01% of its overall area)

Deliverability:

Deemed unsuitable for housing in the 2022 SHELLA report due to mining, flood risk, Japanese knotweed and access problems and a 'high risk' site by the Coal Authority

The site promoter has confirmed that the site capacity is 130 residential units (57 market / affordable homes, 3 retirement bungalows and a 70-unit extra-care facility)

A locally operating Registered Provider is to be engaged to secure the provision and management of the affordable and retirement elements, with the landowner responsible for the delivery and management of the local centre

Other:

Old colliery / mine shafts / sink holes on the site. It was only declared stable if it is not disturbed

Many houses in the vicinity have already suffered subsidence – concerns raised regarding the impact of excavation works on ground stability / further subsidence issues in relation to existing buildings

Brownfield sites in Newcastle-under-Lyne (some of which are owned by the Council) should be developed instead, as they are more suitable – being closer to amenities and employment opportunities, and would deliver positive benefits for the community, particularly disused factory sites, which appear destitute in places and vacant commercial properties in the city centre

Local housing need figures too high – based on inaccurate / out-of-date data; does not consider the Green Belt status of the land; population and employment opportunities in the Borough are falling; there are many vacant homes in the Borough; many additional homes have been built in the area in recent years

Unsustainable location

Loss of agricultural land / reduction in food production capacity

Concern regarding loss or diversion of public footpaths that cross the site

Development contrary to the government's aspirations regarding sustainability and climate change with an emphasis on green spaces

None of the advantages of urbanisation will be delivered – employment, improved transportation and educational opportunities etc

Green spaces, which support physical and mental health, save circa £1.2 billion for the NHS and local health services

Request for a further Call for Sites to find more suitable sites (COVID caused a lot of distraction for lots of reasons)

Insufficient early consultation with residents / their opinions not being properly considered / the site already has planning permission for a development known as 'Boundary Park' / it appears to be a 'done deal' and thus a waste of time objecting to

Mining records indicate there are no mine entrances on the site

The site is a mix of predominantly scrubland and previously developed land (the former Packmoor Working Men's Club and several lock-up garages off Turnhurst Road)

The site is suitable for development – being Grade 4 Agricultural Land, not used for farming, not of any historical interest and not within an AONB (Area of Outstanding Natural Beauty)

Sustainable location – good access to public transport (next to one of the area's main bus corridors and 10 minutes from Kidsgrove Railway Station); good access to many local employment opportunities (the units on Reginald Mitchell Way, the petrol station/food court at the top of James Brindley Way, new units at Ceramic Valley and new warehouses on

Peacocks Hay Road); and good access to existing and proposed local services	
The development will deliver a mix of housing types to address identified local needs (in particular, affordable housing and housing for older people) and will bring more jobs into the area / provide an opportunity for people to live closer to where they work	

72. SB12: Land Adjacent to Clayton Lodge

Summary of Main Issues Raised	Council Response
No accompanying plans to limit the traffic or to improve the already struggling infrastructure.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Historic England - Site needs to consider any impact on Clayton Hall Grade II and Clayton Conservation Area.	

73. SP11: Former Keele Municipal Golf Course

Summary of Main Issues Raised	Council Response
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Impact on air quality – hydrogen sulphide emitted by Walleys Quarry, increased carbon dioxide generated by additional traffic, reduction in the number of trees and the low-lying nature of the area will all combine to further reduce air quality</p> <p>Pollution and disruption whilst building takes place - years of dust, noise, contractor's traffic and general disruption to residents</p> <p>Loss of residential amenity (peace, quiet, privacy and light) for residents and the associated impact on their mental health and wellbeing</p>	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.

<p>Loss of green open space / recreational / countryside space within walking distance of homes, resulting in detrimental impact on local people's physical and mental health / wellbeing, including an adverse impact on local obesity rates</p> <p>The impacts of Walleys Quarry have already resulted in the need for specific mental health services to serve the local population and mental health services recommend the use of green spaces to support health</p> <p>Park Road, which is used by people for exercise (including the disabled, those less mobile and children travelling to school) would become dangerous</p> <p>[Devaluation of local properties]</p>	
<p><i>Social infrastructure:</i></p> <p>Sport England – Objection to the allocation on the grounds that it is sited on a playing field site without it being demonstrated that the site is surplus to requirement, or that replacement provision is to be provided in line with NPPF paragraph 99</p> <p>Sport England – The Playing Pitch Strategy identifies that the site is surplus to requirement, although the driving range should be protected (retained or adequately re-provided as part of the Keele growth corridor exercise). The retention / relocation of the driving range is not explicit within the specific requirements for the site</p> <p>Sport England – Site specific requirements should refer to playing field sites and the need to demonstrate compliance with NPPF paragraph 99, as there is no protection policy contained elsewhere within the Plan</p> <p>Comments from other parties include</p> <p>The golf course is a Community Asset</p>	

Loss of formal sports provision - golf course, driving range, fishing pool and playing fields on Back Lane

Loss of easily accessible recreational open space, which has declined by a third this century (Source: New Economics Foundation) – the flat ground enables the site to be used by people of all abilities and is even accessible to people with disabilities, our ageing communities and those using disability scooters

Recreational space like this must be protected for not just physical but mental well-being / it has always been used as a recreational space

There are several Open Spaces adjoining the site, which are designated in the Open Space and Green Infrastructure Strategy as either 'High Quality / High Value' or 'Low Quality / High Value', the actions for which are to be 'protected and enhanced'. Development of SP11 will result in damage to these areas of Open Space given the volume of inflows of people and the resultant increase in foot traffic

Insufficient infrastructure - doctors, dentists, schools and other services which are already oversubscribed

Already oversubscribed medical facilities will be exacerbated by the additional population leading to increased patient ill-health

Request that GP provision planning gain clauses be considered and implemented and ring-fenced for specific health service space spend – if this does not occur the quality and access to general practice will slip further. Our buildings are at capacity but could be extended (Silverdale and Ryecroft Practice)

An Infrastructure Plan is required – to include highway impacts and how essential services will be met (schools, medical facilities, post office etc)

Transportation:

National Highways – The site is likely to have an impact on the SRN in terms of traffic. The immediate SRN junctions likely to be impacted are M6 J15; and A500 (Queensway) / A34 roundabout. Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed to determine the extent of their potential impacts on the operation of the SRN in the area

Staffordshire County Council – Vehicle and pedestrian access to the site available via A525 Keele Road and Park Road. Off-site improvements required to enhance cycle and pedestrian connectivity to Silverdale, Keele University and Newcastle Town Centre

Staffordshire County Council – Limited amenities / facilities available to serve large-scale development. Inclusion of supermarket and bus services should be considered to support the residential development

Staffordshire County Council – Any Master Plan will need to be supported with a Travel Plan and a Transport Assessment, in line with any scoping note agreed with the Highway Authority

Comments from other parties include

General concern regarding increased traffic – resulting in reduction in road safety and congestion / overloading of already busy local roads

The proposal will lead to new traffic routes (possibly at Keele and one through Silverdale) which will create bottlenecks. Silverdale as a village is

not set up for such an increase in vehicles, particularly around the primary school, which does not have a crossing warden – a consequence of more traffic is a reduction in road safety / increased risk of accidents

Existing road system inadequate – already under pressure due to other new developments in the area (the Hawthorns – c.80 new homes, the Oaks – c.100 new homes and the Hamptons – c. 130 new homes); in a poor state of repair; and unsuitable to accommodate the additional volume of traffic and / or construction-related vehicles

The traffic impact analysis undertaken for Quarry Bank Road (for 435 Units) indicates that there is sufficient capacity on the surrounding highway network, albeit with mitigation at the A525 Keele Road / A525 Newcastle Road / A531 Crewe Road junction, however, there is limited scope for mitigation at the junctions without using third party land

Concern regarding the location of access onto Park Road and associated reduction in road safety (Park Road is used by people for exercise, including the disabled, those less mobile and children travelling to school)

Access would either mean a new junction near to the entrance of the University, which already suffers congestion, or through quiet residential streets in Silverdale

Access via the Keel roundabout is unsuitable as it is too busy already

Access should be provided into Silverdale and not just onto the A525

Access should not be provided into Silverdale but via the entrance to the golf course on Keele Road - Ashbourne Drive and Underwood Road are too small to carry builders' lorries and the vehicles associated with 1,170 additional houses and opening-up the cul-de-sacs off Ashbourne Drive will create a racetrack in Park Road and past the school

Concern regarding loss of Public Rights of Way across the site

On-street parking is already an issue in Silverdale village with parking at local amenities (the parade shops and doctors' surgery) already at capacity, with elderly people often struggling to find somewhere to park when shopping / visiting the GP.

No bus route / public transport inadequate, resulting in people using their cars; new residents likely to commute to major cities for work; and loss of local open space, forcing people to travel to other areas for recreation.

The Infrastructure Baseline Report (October 2021) does not include any analysis of additional traffic congestion arising from additional housing in the western Wards.

Water, drainage & flood risk:

Existing sewage system already under pressure and out-dated (the Rivers' Trust data recently reported large amounts of sewage discharge into the Lyme Brook and its tributaries)

Increased flood risk – the site is on a steep hill (a fall of roughly 45-50 metres from Keele Road to Park Road), is very boggy in places and has natural springs. The undeveloped landforms an important soakaway for rainwater and loss of this, combined with the loss of many mature trees will increase flood risk on lower ground – i.e. Silverdale

The Level One Strategic Flood Assessment shows a flood risk to the Silverdale Brook area and page 62 of the FRA (2008) states “the Silverdale area of the Borough where there have been reports of groundwater flooding ... this remains a long-term risk as pumping and de-watering of the mines will have to occur in perpetuity. It is therefore recommended that future development in this location is avoided due to the residual risk posed”

Regular flooding already occurs during rainstorms and sewage runs out of a number of drain covers. The roads are constantly flooded by heavy rain at the junction of Cemetery Road and Silverdale Road with Underwood Road and Dale View also prone to flooding

Ashbourne Drive was regularly flooded during the 70's and 80's until a trench was dug across the golf course and many, many trees planted

The importance of trees on the site for balancing the hydrology of the surface water with underground aquifer pressure - there should be a Hydrogeological Study to calculate the change to the water equilibrium.

It is well known that if vegetated land is replaced by manufactured materials such as tarmac and concrete then the amount of surface run-off from rainfall alone increases, not to mention the already natural water resources.

The Local Plan's Vision Statement growth states development should mitigate rather than exacerbate localised flooding problems caused by river flooding and / or surface water run-off, yet this does not seem to have been considered when proposing the removal of long-established vegetation.

Request made that the plans for the drainage management of the site be provided. Furthermore, it is not considered unreasonable to expect written agreements that should properties be flooded, all repairs/replacements will be provided by NuLBC, who would be viewed as being responsible.

Biodiversity:

Natural England – This site includes parts of Sites of Biological Importance. We are unable to provide specific advice, but we would

advise that if these allocations will cause adverse impacts on these sites they should be deleted as allocations in line with paragraph 174 of the NPPF

Comments from other parties include

Loss of a re-wilded green space that contains thousands of varied broadleaved and coniferous trees / mature trees, hedgerows and natural habitats – resulting in loss of flora (wild sorrel, rare grasses), reduction in pollination, fragmentation of habitats and wildlife / habitat loss (a diversity of insects and butterflies, bees, slow worm, stag beetle, squirrels, foxes, badgers, hedgehogs, brown long-eared bats, cuckoo, woodpeckers, a range of nesting birds and birds of prey, such as owls, kestrels and buzzards) = net loss in biodiversity

Development should deliver a minimum 10% net gain in biodiversity, which is clearly unachievable

Loss of fishing ponds and natural pools / blue corridors on the land, which have generated a unique marshland habitat and contain a range of wildlife, including amphibians, toads, frogs and newts

Within the site is a Biodiversity Alert Site (Bogs Wood) and a Regionally Important Geological Structure (Job's Wood Quarry) and adjoining its western boundary is another Biodiversity Alert Site (Redheath Plantation) Jobs Wood and Redheath Plantation are old / ancient woodlands (which cannot be replaced) and include protected native flora such a bluebell, marsh marigolds and wood anemones

Unsuitable allocation due to biodiversity impact, protected trees on site (Tree Preservation Orders) and negative assessment for land & soil

Removal of mature trees will reduce air quality, increase flood risk and reduce natural carbon capture / the existing woodland should form part of the development brief for the site

Loss of carbon store – large-scale carbon sequestration is best achieved by retaining and maintaining well-established trees and 'rewilding managed 'grasslands. Threading 'green strips' amongst extensive areas of housing will never achieve the objective of carbon sequestration set out in SO1V

No ecological surveys have been carried out / a detailed statutory designated sites assessment up to 10km will be required to ascertain the National Context of the site along with a Habitat Regulations Assessment

A baseline field survey of the site has confirmed the presence and potential presence of several species (including great crested newts, bats and badgers), all of which pose a high risk to development and require further assessment / mitigation

Keele golf course is an important biodiversity green link between Keele Woods, Silverdale Country Park, Bateswood and Apedale – this site provides an opportunity to create a green corridor on the west side of Newcastle

The UK is one of the most, if not the most, nature-depleted countries in Western Europe

Natural England guidance states that no developments should be permitted near 'protected sites' unless it can be proved that they are nitrate and phosphate neutral

Character:

Historic England – Consider the impact on Keele Hall Registered Park and Garden Grade II opposite the site, as well as Keele Conservation Area and associated listed buildings nearby

Comments from other parties include

Loss visual amenity / the outstanding beauty of the site / significant landscape impact – development would be viewed in the landscape as a conspicuous, large-scale urban extension across the steep sides of the wooded hillside

Development would directly conflict the Landscape Character Area Landscape Strategy guidelines for this character area type, which is to ‘conserve and enhance woodland on steep slopes’

The Overall Appraisal the Landscape Character Assessment Study concludes that “larger residential development on this site would have a major adverse effect on the SA objective to strengthen the quality of the landscape and urban townscape and deliver well-designed development which respects the local character and distinctiveness”

Significant impact the character and setting of the historic village of Silverdale

Urban sprawl will join Silverdale with Keele and Poolfields, thereby removing the character and distinctiveness of each village, contrary to SO-XIII, which states that the vitality of industrial villages should be supported, and their special character preserved and enhanced.

The proposed developments, which will double the size of Silverdale, will undermine its historical character as a village ‘nestled in a green valley’
The Council’s classification of rural and urban parishes pre-disposes certain Wards for amalgamation and compaction, ignoring their historic origins, and creates an elite set of historic villages in more rural areas

Villages such as Silverdale should be defined under 'historic industrial villages and their status should reflect their specific economic and social origins in the development of iron and coal mining on landed estates. These villages have their own identity – a fundamental reason not to incorporate them into the urban core as 'Strategic Centres'

Mass estate house building has a detrimental impact on neighbourhoods and healthy communities, creating artificial, anonymous places that facilitate anti-social behaviour and lack of social cohesion. The scale of development proposed will overwhelm the village and its population, eroding its character as a small rural community

Green Belt:

'Major' harm to Green Belt (overall, the proposals will reduce greenbelt by 25 per cent in Silverdale alone, in perpetuity)

The site provides a 'strong' (not 'moderate') contribution to the Green Belt – on the basis that it is not surrounded by durable boundaries; that development would result in urban sprawl stretching from the Strategic Centre of Silverdale to the proposed settlement boundary of Keele and Keele University; and that the scale and impact of development would have a significant impact on the open countryside / would help eradicate the countryside separation between Silverdale and Keele

Loss of countryside / Green Belt land, which is irreversible and unsustainable (as no compensatory land is proposed as its replacement)

The purpose of the Greenbelt is to check unrestricted sprawl, to safeguard the countryside from encroachment and to preserve setting. This development will merge Silverdale and Keele into one large urban conurbation, thereby losing individuality of each village, which the Green Belt was designated to prevent

<p>Keele (rural) and Silverdale (a mix of urban and rural) should not become part of Newcastle's urban area – they are villages and are distinct and should remain so – protected by the Green Belt</p> <p>The methodology adopted in the Green Belt Review where ‘historic towns’ are given an enhanced status ignores the complex industrial history elsewhere, i.e. historic industrial villages</p> <p>No exceptional circumstances to justify changes to Green Belt designations</p> <p>Government policy is to not remove land from the Green Belt for house building</p> <p>The Council’s Green Belt Assessment is fundamentally flawed, not up-to-date and does not consider the impact of the site on the proposed settlement of Keele & Keele University, or the wider countryside</p>	
<p><i>Deliverability:</i></p> <p>The golf course was given to the Council on the agreement that it will only ever be used as a golf course / there is a covenant on the land</p> <p>The site it has significant technical and environmental constraints (outlined in the Site Selection Interim Report) that have not been fully considered</p> <p>The SHELAA (2022) identified the site as ‘Unsuitable’ for both Housing and Employment use and as a ‘Site not in Deliverable & Developable Supply’</p> <p>The cumulative impact of the potential presence of protected species on the site creates a major issue for the site’s deliverability</p>	
<p><i>Other:</i></p> <p>Over-concentration / disproportionate volume of housing proposed in the area - the net increase in population suggested at Keele, Silverdale and</p>	

one of the developments on the Keele / Thistleberry boundary would add over 2,000 houses, amounting to approximately 4,400 more people, which is unfair in a tightly defined area / the volume of additional population will increase density in Silverdale to 22 pph (only 6.6 pph in the rest of the Borough – using the same assumptions) and would result in an additional 46% households in Silverdale

More sustainable brownfield and underused sites, the town centre and unused retail and commercial premises should be redeveloped before green field sites (also, there are empty properties of all kinds which could be redeveloped for housing)

The Council should be pro-active in seeking out locations that are redundant and work with owners to tackle the neglect

No housing need – based on inaccurate data and an overly optimistic view of job growth in the Borough; the population of Newcastle is falling; there are many vacant homes in the Borough (1,200 – which are unusable and require investment); Government housing targets have been reduced / changed from statutory to advisory; there is an oversupply of housing in England and Wales

The new houses will be rented to students and will therefore have little impact on housing need for local people / affordable housing content too low (should be 50%)

Loss of Grade 3 Agricultural Land / grazing land – for potential food or energy production in the future

The site is on a fault line and may have underground mines (the historic mine at Knutton Manor had shafts sunk close to Park Road), be a former landfill site, or otherwise be contaminated (potential for methane)

Concern regarding underground mines and the impact that construction works (digging, vibrations etc) would have on existing buildings (i.e. loosening of soil / substrate underground that rain or spring water may wash away over time, causing sink holes, for example)

Unsuitable allocation due to its designation as a Regionally Important Geological Site and location within a Mineral Safeguarding Area

No explanation given for the different densities on sites SP11, SP12 and SP23 (which are based on site ownership rather than sound planning grounds)

Contrary to the Council's stated aim of helping to combat climate change
The opinions of local people in Silverdale and Keele have not been considered

No clear rationale for the site selection and no justification to support it in the evidence base

The Sustainability Appraisal identifies many negative definitive assessments in relation to the allocation, including a 'major negative' impact on biodiversity and a 'minor negative' impact on the economy

Development of this scale impractical given its topography and geology / the Site Selection Interim Report refers to the former golf course as being 'relatively flat' (and so suitable for redevelopment), which it is not

The owner of Keele Golf Centre has expressed concern regarding the future of the business, which is within site SP11 and on land leased from the Council. They advise that the business, which employs 15 local people, is thriving and is very popular with a wide range of users and that they would like to retain the site and develop it into a bigger and better facility

Suggestions for the site:

- > retain as a Municipal Golf Course, a natural recreational space / wildlife haven, or as another local recreational attraction, with the old club house redeveloped as a visitor centre with café and/or centre for weddings and events etc;
- > use as a Biodiversity Net Gain area, whereby parcels of land could be purchased by local developers to 'offset' development elsewhere;
- > retain 50% of the site as Green Belt;
- > provide 300 homes at the top of the golf course / near the driving range, with no through-road to Silverdale;
- > develop a portion of the site (potentially the top section, at a higher density) in tandem with the establishment of a large and publicly accessible green space;
- > only build on the land between the University roundabout (on the A525 and proposed allocations SP12 and SP23);
- > retain the field / grassed areas behind Hulme Close and Ashbourne Drive and the cul-de-sacs off Ashbourne to provide a natural buffer;
- > retain of a strip of Green Belt in between Silverdale and Keele to keep them separate and to satisfy some of the concerns around loss of trees and green space;
- > retain the trees that line the A525 (Keele Road)

The site was gifted to the Council on instruction to be used for the good of the people of the Borough and not be built upon

Need for the local planning authority to remain independent despite the Council being owner of the largest proposed site in the area

Potential for increased crime and anti-social behaviour due to increase in population

Alternative sites proposed - the area along Cemetery Road and the disused site in Knutton (where the gym was)

The site is situated in a sustainable location

The area of land to the rear of Hulme Close has never formed part of the Golf Course (notwithstanding common ownership) and the preservation of the field & hedges found here would establish a ready-made defensible boundary. In setting any such boundaries, it is important to be conscious of the watercourses on the golf course and on Park Road. Reference is made to a natural drain which runs the length of the field behind Hulme Close and the properties backing onto that field have previously had ingress of water.

Suggestions for the site (under Other, with underlined text denoting change):
 provide 300-400 homes at the top of the golf course / near the driving range (on Keele Road), with no through-road to Silverdale;

It is unclear how building more homes will increase job opportunities as it is not apparent what commercial development will take place. Nor would the proposals improve Newcastle Town Centre as this needs a major overhaul, recognising that the internet has altered shopping habits, and instead consider other alternative uses, such as entertainment venues and restaurants/cafes.

The Local Plan does not consider the current residents of the village.

74. SP12: Site off Glenwood Close

Summary of Main Issues Raised	Council Response
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<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Loss of light and privacy to existing properties (site on higher ground than the bungalows to the north)</p> <p>Impact on air quality – hydrogen sulphide emitted by Walleys Quarry, increased carbon dioxide generated by additional traffic, reduction in the number of trees and the low-lying nature of the area will all combine to further reduce air quality</p> <p>Pollution and disruption whilst building takes place - years of dust, noise, contractor's traffic and general disruption to residents</p> <p>Loss of amenity (peace, quiet and privacy) for the residents of Glenwood Close and the associated impact on their mental health and wellbeing</p> <p>Loss of local green open / recreational space within walking distance of homes, resulting in detrimental impact on local people's physical and mental health / wellbeing, including an adverse impact on local obesity rates</p> <p>Park Road, which is used by people for exercise (including the disabled, those less mobile and children travelling to school) would become dangerous</p> <p>[Devaluation of local properties]</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Social infrastructure:</i></p> <p>Loss of open / green / recreational space and playing fields on Back Lane</p> <p>Insufficient infrastructure - doctors, dentists, schools and other services which are already oversubscribed</p> <p>Request that GP provision planning gain clauses be considered and implemented and also ring-fenced for specific health service space spend</p>	

– if this does not occur the quality and access to general practice will slip further. Our buildings are at capacity but could be extended (Silverdale and Ryecroft Practice)

Transportation:

National Highways – The site is likely to have an impact on the SRN in terms of traffic. The immediate SRN junctions likely to be impacted are M6 J15; and A500 (Queensway) / A34 roundabout. Should the site be allocated in the final Local Plan, further assessment work may be required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would expect that the proposed site allocation be subject to consultation with National Highways and appropriately assessed in order to determine the extent of their potential impacts on the operation of the SRN in the area

Staffordshire County Council – Off-site improvements required to enhance cycle and pedestrian connectivity to Silverdale, Keele university and Newcastle Town Centre

Staffordshire County Council – Limited amenities / facilities available to serve large-scale development. Inclusion of supermarket and bus services should be considered to support the residential development

Staffordshire County Council – Development will need to be supported with a Travel Plan and a Transport Assessment, in line with any scoping note agreed with the Highway Authority

Other transportation comments from other parties include

Concern regarding increased traffic – resulting in reduction in road safety and congestion / overloading of already busy local roads

Existing road system inadequate – already under pressure due to other new developments in the area (the Hawthorns – c.80 new homes, the

Oaks – c.100 new homes and the Hamptons – c. 130 new homes); in a poor state of repair; and unsuitable to accommodate the additional volume of traffic and / or construction-related vehicles

Park Road is a lane without street lighting or pavements and is unsuitable to serve the development.

Concern regarding impact on Park Road and associated reduction in road safety (Park Road is used by people for exercise, including disabled and those less mobile, and children travelling to school)

Concerns regarding the site access – its gradient, impact on the amenities of adjacent properties, impact on pedestrians etc who currently use the area as an access point to the open space/s, and impact on the mature native trees / biodiversity

Unsuitable allocation due to access constraints

Access should be via SP11 / the golf course

On-street parking is already an issue in Silverdale village with parking at local amenities (the parade shops and doctors' surgery) already at capacity, with elderly people often struggling to find somewhere to park when shopping / visiting the GP

Public transport inadequate, resulting in people using their cars; new residents likely to commute to major cities for work; and loss of local open space, forcing people to travel to other areas for recreation

The Infrastructure Baseline Report (October 2021) does not include any analysis of additional traffic congestion arising from additional housing in the western Wards

Water, drainage & flood risk:

Existing sewage system already under pressure and out-dated (the Rivers' Trust data recently reported large amounts of sewage discharge into the Lyme Brook and its tributaries)

Increased flood risk – the site is known to flood regularly, and ground water and springs will naturally re-route downwards towards Silverdale, there is historic flooding in Glenwood Close and the development will result in increased flood risk to properties in both Glenwood Close and Daleview Drive

The Level One Strategic Flood Assessment shows a flood risk to the Silverdale Brook area and page 62 of the FRA (2008) states “the Silverdale area of the Borough where there have been reports of groundwater flooding ... this remains a long-term risk as pumping and de-watering of the mines will have to occur in perpetuity. It is therefore recommended that future development in this location is avoided due to the residual risk posed”

Removing trees at the top of a hill will result in a higher flood risk in the valley below

The importance of trees on the site for balancing the hydrology of the surface water with underground aquifer pressure - there should be a Hydrogeological Study to calculate the change to the water equilibrium

Biodiversity:

Loss of trees and green space resulting in wildlife / habitat loss and a reduction in the volume and diversity of insects, butterflies, birds and mammals (slow worm, stag beetle, nesting owls, great spotted woodpecker, cuckoo, finches, blue tits, brown long-eared bat, foxes, badgers and hedgehogs) = net loss in biodiversity

Loss of drainage channels along Park Road, which are home to a range of wildlife, in particular, amphibians, toads, frogs and newts

Jobs Wood is ancient woodland (which cannot be replaced) and includes protected native flora such a bluebell, marsh marigolds and wood anemones

Unsuitable allocation due to protected trees on site (Tree Preservation Orders)

Removal of mature trees will reduce air quality, increase flood risk and reduce natural carbon capture / the existing woodland should form part of the development brief for the site

No ecological surveys have been carried out

Negative impact on land & soil
The UK is one of the most, if not the most, nature-depleted countries in Western Europe

Natural England guidance states that no developments should be permitted near 'protected sites' unless it can be proved that they are nitrate and phosphate neutral

Character:

Significant impact on landscape sensitivity and the character and setting of the historic village of Silverdale

Urban sprawl will essentially join Silverdale with Keele, thereby removing the character and distinctiveness of each, contrary to SO-XIII, which states that the vitality of industrial villages should be supported, and their special character preserved and enhanced. The proposed developments, which will double the size of Silverdale, will undermine its historical character as a village 'nestled in a green valley'

<p>The Council's classification of rural and urban parishes pre-disposes certain Wards for amalgamation and compaction, ignoring their historic origins, and creates an elite set of historic villages in more rural areas</p> <p>Historic England – Consider any impacts on Silverdale Conservation Area and St Luke's Church Grade II</p>	
<p><i>Green Belt:</i> 'Major' harm to Green Belt (overall, the proposals will reduce greenbelt by 25 per cent in Silverdale alone, in perpetuity)</p> <p>Loss of countryside / Green Belt land, which is irreversible and unsustainable (as no compensatory land is proposed as its replacement)</p> <p>The purpose of the Greenbelt is to check unrestricted sprawl, to safeguard the countryside from encroachment and to preserve setting. This development will merge Silverdale and Keele into one large urban conurbation, which the Green Belt was designated to prevent (settlements should be distinct and land preserved)</p> <p>The methodology adopted in the Green Belt Review where 'historic towns' are given an enhanced status ignores the complex industrial history elsewhere, i.e. historic industrial villages</p> <p>No exceptional circumstances to justify changes to Green Belt designations</p> <p>Government policy is to not remove land from the Green Belt for house building</p>	
<p><i>Other:</i> Over-concentration / disproportionate volume of housing proposed in the area - the net increase in population suggested at Keele, Silverdale and one of the developments on the Keele / Thistleberry boundary would add</p>	

over 2,000 houses, amounting to approximately 4,400 more people, which is unfair in a tightly defined area / the volume of additional population will increase density in Silverdale to 22 pph (only 6.6 pph in the rest of the Borough – using the same assumptions)

Silverdale should be afforded the same protection as a rural village due to its importance as an industrial village

More sustainable brownfield and underused sites, the town centre and unused retail and commercial premises should be redeveloped before green field sites (also, there are empty properties of all kinds which could be redeveloped for housing)

The Council should be pro-active in seeking out locations that are redundant and work with owners to tackle the neglect

No housing need – based on inaccurate data and an overly optimistic view of job growth in the Borough; the population of Newcastle is falling; there are many vacant homes in the Borough (1,200 – which are unusable and require investment); Government housing targets have been reduced / changed from statutory to advisory; there is an oversupply of housing in England and Wales

Loss of Grade 3 Agricultural Land / grazing land

The site may have underground mines (the historic mine at Knutton Manor had shafts sunk close to Park Road), be a former landfill site, or otherwise be contaminated

Concern regarding underground mines and the impact that construction works (digging, vibrations etc) would have on existing buildings (i.e. loosening of soil / substrate underground that rain or spring water may wash away over time, causing sink holes, for example)

<p>No explanation given for the different densities on sites SP11, SP12 and SP23 (which appear to be based on site ownership rather than sound planning grounds)</p> <p>Contrary to the Council's stated aim of helping to combat climate change Negative impact on mineral safeguarding / unsuitable allocation due to its location within a Mineral Safeguarding Area</p> <p>The opinions of local people in Silverdale and Keele have not been taken into account</p> <p>Development of this scale impractical given the topography and geology of the site</p> <p>Suggestion that only half the site be developed with the remaining land retained as a natural recreation space and wildlife haven</p> <p>Potential for increased crime and anti-social behaviour due to increase in population</p> <p>Sustainable location</p> <p>The development will breathe new life into the area and provide much-needed infrastructure</p>	
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75. SP2: Cheddar Drive

Summary of Main Issues Raised	Council Response
<p>Historic England - Have any impacts on St Lukes Church (Grade 2) and Silverdale conservation area been considered?</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at</p>
<p>No details on infrastructure investment needed to support such a large increase of dwellings to Silverdale</p>	

	Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
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76. SP22 Former Playground, Off Ash Grove

Summary of Main Issues Raised	Council Response
Historic England - Have any impacts on St Lukes Church (Grade 2) been considered?	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
No details on infrastructure investment needed to support such a large increase of dwellings to Silverdale	

77. SP23 Land at Cemetery Road

Summary of Main Issues Raised	Council Response
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Environment Agency – Risk of landfill gas migration to houses in such proximity to a landfill. An assessment of risk and whether this can be appropriately mitigated should form part of any planning submission. We would recommend extensive and detailed ground surveys and potentially restrictions on the construction methodology of any works near the landfill boundary. Consideration should be given to the Ground Conditions and Pollution section of the NPPF (paragraphs 183 to 188)</p> <p>Environment Agency – Nearby receptors have raised serious concerns regarding odour emissions from the site which are subject to on-going regulatory investigation and remediation measures</p> <p>Environment Agency – Whilst the landfill is due to stop accepting waste by January 2027, the site will continue to receive restoration soils until</p>	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.

2042, meaning traffic movements to and from the site will remain until this date

Environment Agency – The landfill will continue to generate gas and leachate, which will need to be monitored and managed by the site owners for several years after closure. No operational landfill would be completely odour free, therefore, due to the proximity of the proposed site allocation, future residents are likely to experience unpleasant odours on occasions. Given the sensitivity of Walley's Quarry we question the suitability of allocating additional housing sites in proximity of the landfill

Comments from other parties include: -

Inappropriate location for housing given its proximity to Whalley's landfill site and associated air pollution (odours)

Impact on air quality – hydrogen sulphide emitted by Walleys Quarry, increased carbon dioxide generated by additional traffic, reduction in the number of trees and the low-lying nature of the area will all combine to further reduce air quality

Pollution and disruption whilst building takes place - years of dust, noise, contractor's traffic and general disruption to local residents

Loss of amenity (peace, quiet and privacy) for local the residents and the associated impact on their mental health and wellbeing

Loss of local green open / recreational space within walking distance of homes, resulting in detrimental impact on local people's physical and mental health / wellbeing, including an adverse impact on local obesity rates

<p>Park Road, which is used by people for exercise (including the disabled, those less mobile and children travelling to school) would become dangerous</p> <p>[Devaluation of local properties]</p>	
<p><i>Social infrastructure:</i> Loss of open / green / recreational space and playing fields on Back Lane</p> <p>Insufficient infrastructure - doctors, dentists, schools and other services which are already oversubscribed</p> <p>Request that GP provision planning gain clauses be considered and implemented and also ring-fenced for specific health service space spend – if this does not occur the quality and access to general practice will slip further. Our buildings are at capacity but could be extended (Silverdale and Ryecroft Practice)</p> <p>An Infrastructure Plan is required – to include highway impacts and how essential services will be met (schools, medical facilities, post office etc)</p>	
<p><i>Transportation:</i> Staffordshire County Council – Off-site improvements required to enhance cycle and pedestrian connectivity to Silverdale, Keele university and Newcastle Town Centre</p> <p>Staffordshire County Council – Limited amenities / facilities available to serve large scale development. Inclusion of supermarket and bus services should be considered to support the residential development</p> <p>Staffordshire County Council – Development will need to be supported with a Travel Plan and a Transport Assessment, in line with any scoping note agreed with the Highway Authority</p> <p>Other transport comments from other parties include</p>	

Concern regarding increased traffic – resulting in reduction in road safety and congestion / overloading of already busy local roads

Existing road system inadequate – already under pressure due to other new developments in the area (the Hawthorns – c.80 new homes, the Oaks – c.100 new homes and the Hamptons – c. 130 new homes); in a poor state of repair; and unsuitable to accommodate the additional volume of traffic and / or construction-related vehicles

Concern regarding the location of access onto Park Road and associated reduction in road safety (Park Road is used by people for exercise and children travelling to school)

On-street parking is already an issue in Silverdale village with parking at local amenities (the parade shops and doctors' surgery) already at capacity, with elderly people often struggling to find somewhere to park when shopping / visiting the GP

Public transport inadequate, resulting in people using their cars; new residents likely to commute to major cities for work; and loss of local open space, forcing people to travel to other areas for recreation

Water, drainage & flood risk:

Environment Agency – Development in proximity of landfill may present a risk to controlled water receptors. An assessment of risk and whether this can be appropriately mitigated should form part of any planning submission

Other water, drainage and flood risk comments from parties include: -

Existing sewage system already under pressure and out-dated (the Rivers' Trust data recently reported large amounts of sewage discharge into the Lyme Brook and its tributaries)

Increased flood risk – the site is a waterlogged field which constantly has water running off it. Ground water and springs will naturally re-route downwards towards Park Road / Silverdale (Cemetery Road and Silverdale Road have already flooded many times in recent years)

The Level One Strategic Flood Assessment shows a flood risk to the Silverdale Brook area and page 62 of the FRA (2008) states “the Silverdale area of the Borough where there have been reports of groundwater flooding ... this remains a long-term risk as pumping and de-watering of the mines will have to occur in perpetuity. It is therefore recommended that future development in this location is avoided due to the residual risk posed”

The importance of trees on the site for balancing the hydrology of the surface water with underground aquifer pressure - there should be a Hydrogeological Study to calculate the change to the water equilibrium

Biodiversity:

Loss of trees and green space resulting in wildlife / habitat loss (a diversity of insects and butterflies, woodpeckers, buzzards, squirrels, foxes, badgers) = net loss in biodiversity

Loss of streams / drainage channels along Park Road, which are home to a range of wildlife, in particular, amphibians, toads, frogs and newts

Jobs Wood is ancient woodland (which cannot be replaced) and includes protected native flora such a bluebell, marsh marigolds and wood anemones

Removal of mature trees will reduce air quality, increase flood risk and reduce natural carbon capture / the existing woodland should form part of the development brief for the site

No ecological surveys have been carried out

<p>Negative impact on land & soil</p> <p>The UK is one of the most, if not the most, nature-depleted countries in Western Europe</p> <p>Natural England guidance states that no developments should be permitted near 'protected sites' unless it can be proved that they are nitrate and phosphate neutral</p>	
<p><i>Character:</i></p> <p>Significant impact on landscape sensitivity and the character and setting of the historic village of Silverdale</p> <p>Urban sprawl will essentially join Silverdale with Keele, thereby removing the character and distinctiveness of each, contrary to SO-XIII, which states that the vitality of industrial villages should be supported, and their special character preserved and enhanced. The proposed developments, which will double the size of Silverdale, will undermine its historical character as a village 'nestled in a green valley'</p> <p>Historic England – Consider impacts on Keele Hall Registered Park and Garden Grade II and associated listed buildings</p>	
<p><i>Green Belt:</i></p> <p>'Major' harm to Green Belt (overall, the proposals will reduce greenbelt by 25 per cent in Silverdale alone, in perpetuity)</p> <p>Loss of countryside / Green Belt land, which is irreversible and unsustainable (as no compensatory land is proposed as its replacement)</p> <p>The purpose of the Greenbelt is to check unrestricted sprawl, to safeguard the countryside from encroachment and to preserve setting.</p>	

<p>This development will merge Poolfields with Keele and Silverdale creating one large urban conurbation which the Green Belt was designated to prevent</p> <p>The methodology adopted in the Green Belt Review where 'historic towns' are given an enhanced status ignores the complex industrial history elsewhere, i.e. historic industrial villages</p> <p>No exceptional circumstances to justify changes to Green Belt designations</p> <p>Government policy is to not remove land from the Green Belt for house building</p> <p>Development of the site would not unacceptably harm the Green Belt – the site has strong and defensible boundaries and is visually contained due to local topography; it would not result in unrestricted urban sprawl into the open countryside or the coalescence of settlements and would not set a precedent for further development to the west of the University campus.</p> <p>Should site SP11 be confirmed, this site would comprise logical infill</p>	
<p><i>Deliverability:</i></p> <p>The site promoters are willing to work positively with the Council to deliver a masterplan-led approach to ensure a high quality, sustainable development, to include green infrastructure, on-site open space and the stated 200 homes</p> <p>The owner has confirmed their intention of engaging with potential developers to ensure that the site is deliverable within the Plan period</p>	
<p><i>Other:</i></p> <p>Over-concentration / disproportionate volume of housing proposed in the area - the net increase in population suggested at Keele, Silverdale and</p>	

one of the developments on the Keele / Thistleberry boundary would add over 2,000 houses, amounting to approximately 4,400 more people, which is unfair in a tightly defined area / the volume of additional population will increase density in Silverdale to 22 pph (only 6.6 pph in the rest of the Borough – using the same assumptions)

Silverdale should be afforded the same protection as a rural village due to its importance as an industrial village

More sustainable brownfield and underused sites, the town centre and unused retail and commercial premises should be redeveloped before green field sites (also, there are empty properties of all kinds which could be redeveloped for housing)

The Council should be pro-active in seeking out locations that are redundant and work with owners to tackle the neglect

No housing need – based on inaccurate data and an overly optimistic view of job growth in the Borough; the population of Newcastle is falling; there are many vacant homes in the Borough (1,200 – which are unusable and require investment); Government housing targets have been reduced / changed from statutory to advisory; there is an oversupply of housing in England and Wales

Loss of agricultural / grazing land – for potential food or energy production in the future

The site may have underground mines (the historic mine at Knutton Manor had shafts sunk close to Park Road), be a former landfill site, or otherwise be contaminated

Concern regarding underground mines and the impact that construction works (digging, vibrations etc) would have on existing buildings (i.e.

loosening of soil / substrate underground that rain or spring water may wash away over time, causing sink holes, for example)

No explanation given for the different densities on sites SP11, SP12 and SP23 (which appear to be based on site ownership rather than sound planning grounds)

Contrary to the Council's stated aim of helping to combat climate change
Negative impact on mineral safeguarding

The opinions of local people in Silverdale and Keele have not been taken into account

Suggestion that only half the site be developed with the remaining land retained as a natural recreation space and wildlife haven

The development will breathe new life into the area and provide much-needed infrastructure

The site is situated in a highly sustainable location and forms an important component of the Council's overall development strategy, providing a strategic link between the growth of the urban area and the growth of Keele University and Science Park

The site could deliver a mix of housing - traditional family housing, 'starter homes' and 30% affordable housing - providing a range of housing opportunities for those with links to the University (graduates, research students and university professionals), thereby reducing distances travelled to work.

The scale of development should be reduced to an acceptable level to retain Boggs Wood and preserve the existing vegetation and bluebells for future generations to continue enjoying.



78. TB19 Land South of Newcastle Golf Club

Summary of Main Issues Raised	Council Response
Whitmore Road has heavy traffic – will require traffic mitigation measures including speed limitation measures	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Traffic volume and safety concerns of site proposal on Whitmore Road and Seabridge Lane	
Access constraints, particularly on A53	
Lack of local amenities and infrastructure near to development	
Increased pollution from development when the area already suffers with Walley's Quarry	
Environment Agency - Presence of unmodelled watercourses within the plan area which presents a flood risk that needs to be investigated. Opportunities for flood risk and ecological betterment/ water quality enhancement should be fully investigated and implemented.	
These landforms open countryside forming the buffer between the established residential areas of Westlands and Seabridge and the predominantly open countryside of Butterton and Whitmore.	
Loss of Green Belt objected too.	
Combined with the other sites for potential allocation (SP11 etc.), there is no demand for this number of houses so no justification for greenbelt	
Brownfield sites closer to town centre	
Reduced biodiversity and loss of wildlife	
Amenity impacts from wind turbines and proximity to M6	
Flooding impacts, particularly surface water impacts	
A new wildlife corridor should be created up to the golf course.	
Reduce the number of houses from 500.	
National Highways - Further assessment required to ascertain the impact on the SRN and to determine the need for mitigation. National Highways would like to be consulted on this.	
Historic England - Several heritage assets to consider, including Trentham Gardens Registered Park and Garden Grade II*, Hargreaves Lodge Grade	

<p>II, many listed buildings around Trentham, Hanchurch and off Whitmore Road.</p>	
<p>Affordable housing – question the need for</p>	
<p>Sport England - Development needs to be appropriately designed so that it would not prejudice the use of the adjacent golf course or place unreasonably restrictions on the facility in line with NPPF paragraph 187</p>	
<p>Should this site go forward, it is contradictory to Government’s statements on prioritising brownfield sites.</p>	
<p>Field is home to protected wildlife</p>	
<p>The existing storm drains that run under Guernsey Drive would not take any additional surface water.</p>	
<p>Infrastructure is required to connect the site across to Keele university to prevent vehicles then driving the long way round via Sneyd Avenue.</p>	
<p>This development should include dedicated pedestrian and cycle paths to Keele University.</p>	
<p>This proposal has been rejected a few times – what is changed?</p>	
<p>The scale of the development impacts the character of the area.</p>	
<p>Woodland</p>	
<p>Proximity to Keele Hall Registered Park and Gardens</p>	
<p>The development should be sympathetic to the area</p>	
<p>Infrastructure is required to connect the site across to Keele University to prevent vehicles then driving the long way round via Sneyd Avenue</p>	
<p>Staffordshire County Council - Off-site improvements required to implement speed limit reduction scheme along A53, enhance cycle and pedestrian connectivity to built-up area to the east, Keele university (west) and Newcastle Town Centre (Northeast). Development will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority. A Travel Plan will be required to support the development.</p>	
<p>Natural England - A water course within the site is upstream of King's & Hargreaves Woods SSSI and runs through the SSSI. Drainage from the site could impact the SSSI. The site partly includes and is adjacent to</p>	

<p>Springpool Wood Site of Biological Importance and is adjacent to Hands Wood and Pie Rough Biodiversity Alert Site.</p>	
<p>Site promotor notes that the site is deliverable, suitable and achievable and supports allocation in the Plan</p>	
<p>National Grid Electricity Distribution - The plan acknowledges the need for a masterplan led approach. However, the policy text makes no reference to the 132kV overhead line (part of NGED's Barlaston Circuit) which runs through the centre of the site, roughly north to south. The overhead line represents essential infrastructure to the delivery of electricity to homes and businesses in Newcastle-Under-Lyme and the wider area. This needs to be mentioned in a masterplan</p>	
<p>Keele Parish - It is not clear whether there will be direct access to the University Road network, but we are assured that the University will not permit a through route to the A525, as this would cause even more congestion at peak times on access to and journeys through the campus.</p>	

79.TB23 Land West of Galingale View

Summary of Main Issues Raised	Council Response
<p><i>Residential amenity / Health and wellbeing:</i></p> <p>Environment Agency - Risk of landfill gas migration to houses in such proximity to a landfill. An assessment of risk and whether this can be appropriately mitigated should form part of any planning submission. We would recommend extensive and detailed ground surveys and potentially restrictions on the construction methodology of any works near the landfill boundary. Consideration should be given to the Ground Conditions and Pollution section of the NPPF including paragraphs 183 to 188.</p> <p>Environment Agency - Nearby receptors have raised serious concerns regarding odour emissions from the Walley's Quarry landfill site which are subject to on-going regulatory investigation and remediation measures.</p> <p>Environment Agency - Whilst the landfill is due to stop accepting waste by January 2027, the site will continue to receive restoration soils until 2042, meaning traffic movements to and from the site will remain until this date</p> <p>Environment Agency - The landfill will continue to generate gas and leachate, which will need to be monitored and managed by the site owners for several years after closure. No operational landfill would be completely odour free, therefore, due to the proximity of the proposed site allocation, future residents are likely to experience unpleasant odours on occasions. Given the sensitivity of Walley's Quarry we question the suitability of allocating additional housing sites in proximity of the landfill.</p> <p>Other comments from other parties include Inappropriate location for housing given its proximity to Whalley's landfill site and associated air pollution (odours) / development at 'The</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>

<p>Hamptons' initially refused planning permission by the Council on the grounds of odour</p> <p>Concern regarding loss of visual amenity and potential loss of light / overshadowing of adjacent houses</p> <p>Increase in noise, pollution, disturbance and danger from increased traffic</p> <p>Detrimental impact on air quality, particularly from dust and vehicle emissions caused by increased traffic (proximity limits to main roads should be set, as for landfill sites)</p>	
<p>Social infrastructure: Insufficient infrastructure - schools, GP surgeries and other services which are already oversubscribed</p> <p>Loss of open / green space</p> <p>The development will deliver new and accessible multi-functional open spaces, amenity spaces, green infrastructure and improved connectivity via green corridors through the site</p>	
<p>Historic England - consider heritage assets within the vicinity including Keele Hall Registered Park and Garden Grade II.</p>	
<p><i>Transportation:</i> Staffordshire County Council -Development will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority.</p> <p>Staffordshire County Council - A Travel Plan will be required to support the development.</p> <p>Other transport related comments include</p>	

<p>Concern regarding increased traffic - resulting in reduction in road safety and congestion / overloading of already busy local roads</p> <p>Existing road system inadequate, in a poor state of repair and unsuitable to accommodate additional traffic (some still not adopted by the Council)</p> <p>Inadequate public transport (resulting in people continuing to use their cars)</p> <p>Satisfactory vehicular access can be achieved</p> <p>Excellent transport connectivity - excellent access to the strategic highway network and well served by public transport (regular bus services to Newcastle-under-Lyme, Stoke, Crewe, Nantwich and Stoke-on-Trent railway station with on-going travel by rail available to Crewe, Manchester, Birmingham, London etc)</p>	
<p><i>Water, drainage & flood risk:</i></p> <p>Environment Agency - Development in proximity of landfill may present a risk to controlled water receptors. An assessment of risk and whether this can be appropriately mitigated should form part of any planning submission.</p> <p>Comments from other parties include</p> <p>Existing sewage system already under pressure and out-dated (the Rivers' Trust data recently reported large amounts of sewage discharge into the Lyme Brook and its tributaries)</p> <p>Unsuitable allocation due to flood risk/located within Flood Zones 2 and 3</p> <p>Increased risk of flooding due to 'run-off'</p>	
<p><i>Biodiversity:</i></p>	

<p>Loss of high quality natural and semi-natural greenspace, trees, diverse flora and natural habitats to a range of fauna (including lizards and owls, bats, newts and woodpeckers - all of which are protected species) = net loss in biodiversity</p> <p>Loss of natural carbon capture</p> <p>The site currently comprises low value grassland and its development will support biodiversity enhancement through the protection and enhancement of existing features of the site, including mature tree belts and the creation of new habitats for a range of species</p>	
<p><i>Character:</i> Unsuitable allocation due to impact on landscape Consider heritage assets within the vicinity, including Keele Hall Registered Park and Garden Grade II (Historic England)</p>	
<p><i>Green Belt:</i> 'Major' harm to the Green Belt</p> <p>Loss of countryside / Green Belt land, which is irreversible and unsustainable (as no compensatory land is proposed as its replacement)</p> <p>The urban area of Newcastle will expand and encroach into Keele and Silverdale resulting in urban sprawl</p>	
<p><i>Deliverability / Viability:</i> Persimmon consider that there are no environmental or technical constraints to development of the site, subject to suitable mitigation / a sensitive approach to design and that the site is available, suitable, achievable, viable and deliverable (at a reduced capacity of 103 dwellings)</p> <p>Persimmon is committed to the site and consider that it could be brought forward in the Local Plan period</p>	

<p>Potentially a former mining or landfill site (i.e. contaminated)</p>	
<p><i>Other:</i> Only brownfield sites should be developed with all of the green areas in the local plan retained in their present use</p> <p>No housing need – the Borough has exceeded its housing targets in recent years and that recent data ('Housing crisis fact check', Community Planning Alliance) indicates that “there are 1.5 million more dwellings than households” in England and Wales alone / there are more than 1,000 empty homes in Newcastle Borough</p> <p>Potential increase in anti-social behaviour in the area due to increase in population / likelihood of student houses in the area</p> <p>Loss of agricultural land / decrease in food production capacity</p> <p>Sustainable location – within the settlement boundary, naturally linked to existing development, would contribute to a sustainable pattern of development, served by a range of existing services and facilities, and strategically located to support key employers in the area (such as Keele University)</p> <p>The allocation will deliver a range of economic benefits to the local area and cutting-edge net-zero technologies through the design, construction and operation of new homes</p> <p>Looks like a rational proposal given the existing infrastructure</p> <p>Support on the grounds that housing and affordable housing is needed for local people</p>	

80.TB6: Former Pool Dam Pub Site

Summary of Main Issues Raised	Council Response
<p><i>Character:</i> Historic England - No designated heritage assets nearby.</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p><i>Other:</i> No housing need - there are enough houses</p> <p>The land should be allotments for local residents as there are none in Poolfields</p>	
<p>Looks like a rational proposal given the existing infrastructure</p>	

81. TC22: Marsh Parade

Summary of Main Issues Raised	Council Response
Staffordshire County Council - Development will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority. A Travel Plan will be required to support the development.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Historic England - Consider impacts on Stubbs Walk Conservation Area, consider impact on listed buildings on Marsh Parade.	
This site is currently at pre-application stage, and the site has already been cleared. Revised planning drawings are currently being prepared following receipt of SPCG comments. Aspire Housing anticipate submitting a planning application during the first quarter of 2024.	
Anything developed here must have dedicated and adequate parking to prevent even more inappropriate parking on Hassell Street and in this general area.	

82. TC40: Car Park, Blackfriars

Summary of Main Issues Raised	Council Response
Staffordshire County Council - The Town Centre Car Park rationalisation strategy must be supported in any planning application submission for the redevelopment of public car parks, demonstrating that alternative local provisions are available to prevent on-street and indiscriminate parking on the local highway network.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Historic England - Consider impacts to Newcastle Town Centre Conservation Area, Old Orme Boys School Grade II.	

83. TC45 York Place

Summary of Main Issues Raised	Council Response
Staffordshire County Council - Delivery/ Service Management Strategy required to support development to permit off-peak loading/ unloading on Merrial Street. The site will need to contribute towards the Staffordshire County Council Walking and Cycling Improvement Plan.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Historic England - Within Newcastle Town Centre Conservation Area and a number of nearby listed buildings, will need to consider impact.	

84. TC7: Land bound by Ryecroft

Summary of Main Issues Raised	Council Response
<p>Staffordshire County Council - Vehicular and pedestrian access available via Liverpool Road, Corporation Street, Merrial Street, and Ryecroft. Off-site footway/cycleway infrastructure improvements required along Corporation Street to enhance sustainable travel links in accordance with LCWIP. Direct pedestrian/cycle route between A52 Ryecroft Toucan Crossing and Merrial Street/Corporation Street to be secured by the internal layout to improve connectivity to the town centre. Hard parking measures to be applied for residential development due to Air Quality concerns. Parking survey will need to be undertaken to confirm the current usage of the public parking provision and demonstrate that any usage can be displaced/ accommodate on site without giving rise to any highway safety issues/ indiscriminate parking. Development will need to be supported with a Transport Assessment in line with any scoping note agreed with the Highway Authority. A Travel Plan will be required to support the development.</p>	<p>The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.</p>
<p>Historic England - Need to consider impacts on Newcastle Town Centre Conservation Area and a number of listed buildings in the area.</p>	
<p>McCarthy Stone supports the proposed Strategic Centre (Town) allocation TC7 in Newcastle, which has the capacity to deliver 75 units and 1.63Ha of employment land. The Draft Local Plan suggests this allocation should be masterplan led, with flexible policy wording to allow planning applications that align with the allocation without prejudice to the rest of the allocation. McCarthy Stone supports policies promoting a mix of housing types and sizes, including aspirational, well-designed, and adaptable housing, and ensuring housing is suitable for older people.</p>	
<p>Aspire currently have an interest in several sites, some of which are identified as proposed allocations including TC7.</p>	

85. TK10: Land at Crown Bank

Summary of Main Issues Raised	Council Response
Where would access come from? Pitt Lane is too narrow which would constrain access.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Development would add to traffic build up on Pitt Lane	
Land has been assessed as high-risk mining area, and the water pollution from the abandoned mines could pollute Talke conservation area	
TK10 runs alongside Talke conversation area therefor development will affect rural character and heritage	
Next to Parrot’s Drumble nature reserve, TK10 would disrupt the wildlife that reside there and affect the rural landscape / character	
Brownfield sites in the area, why are greenfield sites such as TK10 being considered?	
Objection as site is in the Green Belt	
Strategic objective SO-VI to support the vitality of rural villages, preserving and enhancing the special character which is valuable to each community...the number of developments in Talke are out of proportion and will overwhelm the village.	
Air Quality: Potential emissions and dust from construction activities and increased vehicle emissions that could affect air quality and residents' health. As a village with an elderly population of an ex-mining population with high incidences of both Asthma and COPD, air quality is vital to health	
Not enough infrastructure to support proposed housing number in Talke (Doctors, schools etc.)	
Historic England - Consider impact on Talke Conservation Area, Church of St Martin Grade II and other nearby heritage assets.	

86. TK17: Land off St Martins Road

Summary of Main Issues Raised	Council Response
The development will severely affect traffic through the village.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
St Martins currently has a crumbling area by the proposed site and the extra cars associated with these dwellings would only exacerbate the issues here and throughout various estate roads.	
Historic problems with flooding around TK17	
Many houses in Talke and Talke Pits are built on the top of pits and therefore many houses along High Street have tie bars which residents at the time of purchase were informed are necessary to protect against subsidence - what has changed?	
Objection as site is in the Green Belt and brownfield sites in area	
United Utilities - Sewers pass through this site which will need to be taken into consideration. In addition, we have noted a modelled risk of sewer flooding.	
Strategic objective SO-VI to support the vitality of rural villages, preserving and enhancing the special character which is valuable to each community...the number of developments in Talke are out of proportion and will overwhelm the village.	
Air Quality: Potential emissions and dust from construction activities and increased vehicle emissions that could affect air quality and residents' health. As a village with an elderly population of an ex-mining population with high incidences of both Asthma and COPD, air quality is vital to health	
Not enough infrastructure to support proposed housing number in Talke (Doctors, schools etc.)	
Historic England - consider impacts on nearby listed buildings including Harecastle Farmhouse Grade II.	

87. TK27: Land off Coppice Road

Summary of Main Issues Raised	Council Response
Objection as site is in the Green Belt	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Thomas street has a brownfield site which should be prioritised over any greenfield	
There is a brownfield site (car park) at the bottom of Swan Bank that should be prioritised over any greenfield	
Highways department halted planning permission for 3 new dwelling on Merelake Road due to increased traffic – this proposal is for 90 dwellings.	
Junction at Coppice Road, Swan Bank and Rockhouse Lane is prone to multiple accidents and the development may create more of a hazard with additional estimated 180 cars.	
The extra traffic on Coppice Road will delay the bus route further	
The junction also floods regularly as well as Merelake Road	
Old mine workings in the area some of which are on TK27 from Bunkershill Colliery	
Lack of amenities in surrounding area	
When there are issues on the M6 and A500, drivers use Coppice Road as a shortcut which often leads to standstill traffic. This development will exacerbate this issue for residents.	
Air Quality: Potential emissions and dust from construction activities and increased vehicle emissions that could affect air quality and residents' health. As a village with an elderly population of an ex-mining population with high incidences of both Asthma and COPD, air quality is vital to health	
Strategic objective SO-VI to support the vitality of rural villages, preserving and enhancing the special character which is valuable to each community...the number of developments in Talke are out of proportion and will overwhelm the village.	
Not enough infrastructure to support proposed housing number in Talke (Doctors, schools etc.)	

Historic England - Consider impact on Talke Conservation Area, Church of St Martin Grade II and other nearby heritage assets.	
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88. TK6: Site at Coalpit Hill, Talke

Summary of Main Issues Raised	Council Response
Strategic objective SO-VI to support the vitality of rural villages, preserving and enhancing the special character which is valuable to each community...the number of developments in Talke are out of proportion and will overwhelm the village.	The council published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy.
Air Quality: Potential emissions and dust from construction activities and increased vehicle emissions that could affect air quality and residents' health. As a village with an elderly population of an ex-mining population with high incidences of both Asthma and COPD, air quality is vital to health	
United Utilities - Sewers pass through this site which will need to be taken into consideration.	
A public sewer passes through this site, which will need to be taken into consideration	
Not enough infrastructure to support proposed housing number in Talke (Doctors, schools etc.)	
Sport England - Site identified as a former school playing field site in SHELAA. Site noted contained within the Council's Playing Pitch Strategy.	
Historic England - consider impact on Talke Conservation Area, Church of St Martin Grade II and other nearby heritage assets.	