

LIGHTWOOD COMMUNITY GROUP

CONSOLIDATED REGULATION 19 REPRESENTATION

Objection to Allocation BL1: Lightwood

Requested modification: Delete Allocation BL1 from the Stoke-on-Trent Local Plan and retain the land within the Green Belt.

Part A - Represor details

Plan	Stoke-on-Trent Local Plan 2020-2040, Publication (Regulation 19) version
Site / policy	Allocation BL1: Lightwood - approximately 113.19 hectares; up to 3,000 dwellings
Represor	Lightwood Community Group
Named representative	David Evans, Chair Lorraine Zutshi, local resident
Contact details	Dovedale, Rosehill Road, Stoke Heath, Market Drayton, TF9 2JU Email: lcgstoke@gmail.com Telephone: 07711 152 966
Authority	Approved by the Lightwood Community Group committee via WhatsApp on 13 September 2026. The committee authorised this consolidated representation and approved David Evans, Chair, and Lorraine Zutshi, local resident, as proposed participants in relevant examination hearing sessions.
Legal compliance	No / not demonstrated in the respects identified in section 3; the principal objection is to soundness
Soundness	No - the allocation is not justified, effective or consistent with national policy on the evidence published
Strategic cooperation	Not demonstrated - cross-boundary matters remain material to soundness and effectiveness
Examination hearing	Yes - the Group wishes David Evans, Lorraine Zutshi and/or an authorised substitute to participate

Part B - Representation on Allocation BL1

1. Executive summary

The Lightwood Community Group, on behalf of the residents it represents, objects in the strongest terms to the allocation of BL1 and seeks its deletion from the Local Plan.

This is not an argument about whether 3,000 homes should instead become a smaller number of homes. It is an objection to the strategic decision to remove this land from the Green Belt at all. Housing need does not remove the requirement to justify Green Belt release, and the Council has not demonstrated that BL1 should be released or that reasonable lower-harm alternatives have been fully exhausted.

The published evidence identifies material constraints and dependencies: Medium-High landscape sensitivity; effects on openness, countryside character and settlement separation; a connected stream, woodland and hedgerow network; mineral safeguarding and archaeological interest; highway and cross-boundary transport impacts; water, wastewater and drainage questions; social-infrastructure requirements; and a viability appraisal with limited sensitivity headroom. At the same time, the 3,000-home capacity derives from high-level density assumptions rather than a final constraint-tested masterplan.

The August 2026 Infrastructure Delivery Plan identifies some headline needs, but it does not cure the central evidential deficiency. It does not provide a complete BL1-specific package of provider commitments, sites, costs, funding, phasing, triggers and contingency. The Council is therefore asking the Local Plan process to accept a 3,000-home Green Belt allocation before the infrastructure required to make it work has been demonstrated. On the evidence published, BL1 is not shown to be justified, effective or consistent with national policy.

Core case: Green Belt release cannot be the starting point or the residual answer once a citywide housing figure has been identified. The Council must first establish the genuinely residual need after completions, commitments, permissions, windfall, brownfield and other urban supply have been reconciled; fully examine reasonable lower-harm alternatives; and then demonstrate why this Green Belt land, this boundary and this scale of release are necessary. Only after that can a credible capacity be derived from the site's actual constraints and infrastructure requirements. Instead, the Council has fixed the BL1 boundary and a 3,000-home figure before completing those steps. It is asking the Inspector and affected communities to accept the strategic decision first and discover later whether the evidence can support it. That is the wrong way round.

2. Status and scope of this representation

This is a single consolidated representation expressing the common position authorised by the Lightwood Community Group. It is intended to be read as a complete Part B response concerning Allocation BL1. The supporting objection matrix and evidence schedule explain the source, confidence and appropriate treatment of individual points; they do not turn unverified community reports into established facts.

The Group asks the Council to enter this document into the consultation portal in full, without paraphrase, and to include it and its schedules in the Statement of Representations submitted for examination. In its written clarification of 4 September 2026, the Council confirmed that emailed and postal representations will be accepted, entered into the portal in full and included in that statement, even though the portal and standard form are recommended as best practice.

3. Applicable national policy and procedural position

The governing soundness tests are those in NPPF paragraph 36: whether the plan is positively prepared, justified, effective and consistent with national policy. The Group's case on BL1 is principally that the allocation is not justified, not effective and not consistent with national policy; the cross-boundary and housing-strategy issues also bear on whether the plan is positively prepared. The sections below apply those tests to the published evidence rather than treating them as labels in isolation.

3.1 National policy transition

Policy / legal-position conclusion: The applicable national policy basis for BL1 must be the correct transitional framework. Annex A to the August 2026 NPPF preserves the December 2024 Framework for legacy-system plans; any different approach by the Council would require an explicit and legally coherent transitional basis.

The Regulation 19 consultation is being conducted under the Town and Country Planning (Local Planning) (England) Regulations 2012. A replacement NPPF was published on 17 August 2026, during the consultation. Annex A to that Framework states that plans being prepared under the new 2026 Regulations should follow the new Framework, while "any other plans" should continue under the December 2024 Framework, subject to its transitional arrangements. On that basis, this representation applies the December 2024 NPPF to soundness. If the Council considers a different national policy framework applicable, it must identify that framework expressly and explain the transitional basis. The central evidence and deliverability concerns remain relevant in either event.

The timing nevertheless raises a procedural fairness concern. A replacement national policy framework became available part-way through the period in which residents were being asked to make formal Regulation 19 representations. Even if the transitional position ultimately leaves the December 2024 Framework applicable, the appearance of a new Framework during the consultation created obvious scope for confusion about the tests residents were expected to address. The Council should demonstrate what guidance it gave consultees on the applicable policy position and how it ensured that residents had a fair opportunity to make informed representations.

3.2 Plan period

Policy / soundness conclusion: The 2020–2040 plan period is inconsistent with NPPF paragraph 22 unless it provides at least 15 years from adoption. On the Council's published timetable, that minimum period is not presently secured; the plan is therefore unsound on this point unless the plan period is extended or the Council establishes a compliant adoption horizon.

The plan covers 2020-2040. The Council's published timetable anticipates submission in December 2026, with examination thereafter; no firm adoption date is stated. The December 2024 NPPF expects strategic policies to look ahead over a minimum 15-year period from adoption, with longer periods for major strategic development where appropriate. The published timetable therefore leaves a material question over whether the plan period will provide the required forward-looking period from the actual date of adoption. The Council has not resolved that question in the material reviewed by the Group. It must be tested explicitly before the plan is found sound.

There is also very little timetable contingency. Government guidance confirms that 31 December 2026 is the final date for submission of local plans under the legacy regulations. The Council's stated intention to submit in December 2026 therefore places this plan at the end of the transition window. That deadline does not itself make BL1 unsound, but it reinforces the importance of resolving material evidence and deliverability deficiencies before submission rather than relying on post-submission repair.

3.3 Evidence publication and consultation fairness

Policy / soundness and fairness conclusion: BL1 is not supported by the relevant, up-to-date, adequate and proportionate evidence base expected by NPPF paragraph 32, while the late and evolving evidence has also frustrated the effective engagement expected by paragraph 16(c) by preventing residents from testing the allocation against a settled evidential basis.

Residents have been asked to make formal Regulation 19 representations while material parts of the evidence base were still being published or remained capable of further development, including the August 2026 Infrastructure Delivery Plan. That matters because Regulation 19 is the stage at which the soundness of the plan is meant to be tested. Residents cannot meaningfully test an allocation against evidence that appears late, changes during the consultation or is not accompanied by the underlying data and methodology needed to interrogate it. The Council must therefore provide a clear document chronology showing what evidence was available on what date, what changed, and what datasets, methodologies and provider responses support the conclusions relied upon for BL1.

The timing of the consultation has also had a practical effect on participation. The Group has been told by residents that summer holidays prevented some people from attending published public meetings or engaging with the process when those opportunities occurred. A summer consultation period does not of itself invalidate the process, but when combined with late and evolving evidence it can materially frustrate effective participation. The Council should explain what steps were taken to ensure that affected communities had a genuine and reasonable opportunity to understand the evidence and respond to it.

The practical engagement issue is particularly acute for residents immediately outside the city boundary who may experience material effects from BL1 but were not within the geographical focus of the Council's city-based consultation programme. That cross-boundary engagement issue is addressed further in section 14.

The Group has also used information-rights requests to obtain material relevant to the allocation. Stoke-on-Trent City Council request SOT-148507 concerning the Woodpark Lane watercourse crossing, bridge/culvert and flood records was received on 7 August 2026; the Council's acknowledgement stated that a response was due by 7 September, and no substantive response had been identified by the Group as at 13 September 2026. Staffordshire County Council request F0038300 concerning Cocknage Road was answered on 10 September 2026. That response and the accompanying Highway Operations Site History Report are now included in this representation and materially confirm the existence of a culverted watercourse and repeated highway drainage records at Cocknage Road. The requests and responses evidence the records held; they do not by themselves establish the hydraulic cause of flooding or the effect of BL1. The Group asks that any further response received after submission be accepted as supplementary evidence for examination where it bears directly on matters raised in this representation.

The breadth and seriousness of the evidenced concerns about BL1 also make it important that they are addressed before submission rather than simply deferred to examination. The Planning Inspectorate's procedure guide for Local Plan examinations makes clear that authorities should seek to resolve substantive concerns about soundness and legal compliance before submission and should not assume that examination can rectify significant problems. For BL1, substantial questions remain over the evidence supporting Green Belt release, capacity, infrastructure, transport, drainage and other site-specific constraints. Submitting the allocation while those material deficiencies remain unresolved would transfer to the examination stage issues that should properly have been addressed through plan preparation and the pre-submission process.

The Group's principal case is that the allocation is unsound. It does not at this stage make a concluded allegation that the Regulation 19 process was legally invalid. The Group reserves its position on legal compliance until the publication chronology and Regulation 19 document set can be fully reconciled.

4. Green Belt release and reasonable alternatives

Policy / soundness conclusion: BL1 has not been shown to satisfy NPPF paragraphs 145–148 and is therefore not justified or consistent with national policy. Green Belt boundaries may be altered only where exceptional circumstances are fully evidenced and justified; before concluding that such circumstances exist the Council must fully examine reasonable alternatives, and where release is necessary paragraph 148 sets a priority order of previously developed land, then grey-belt land which is not previously developed, then other Green Belt locations. The published evidence does not provide an auditable route from identified housing need, through those alternatives and that release hierarchy, to this 113.19-hectare boundary and 3,000-home allocation.

BL1 is the plan's largest strategic housing allocation and requires the release of approximately 113.19 hectares from the Green Belt. The supporting mapping makes the proposed boundary change clear: the Council's Local Development Framework Proposals Map – Southern Half, updated 2013, shows the existing Green Belt across the Lightwood area, while the Regulation 19 proposed Policies Map redraws the boundary to accommodate BL1. A CPRE Green Belt extract is included only as secondary visual context and is not relied upon in place of the Council's adopted-policy mapping. NPPF paragraph 143 identifies five Green Belt purposes: checking unrestricted sprawl of large built-up areas; preventing neighbouring towns from merging; safeguarding the countryside from encroachment; preserving the setting and special character of historic towns; and assisting urban regeneration by encouraging the recycling of derelict and other urban land. Paragraphs 145–147 require changes to Green Belt boundaries to be fully evidenced and justified, and all other reasonable options to be examined fully, including making as much use as possible of suitable brownfield and underused land, optimising density and considering whether neighbouring authorities could accommodate some of the need. The Council's own published Green Belt explanation puts the sequence plainly: before Green Belt sites can be considered, councils must show that other options have been exhausted. A citywide housing requirement is therefore not evidence that this particular boundary, this scale of Green Belt release or a capacity of 3,000 dwellings is necessary. The Council must demonstrate that case. The published evidence does not.

The December 2024 Framework also introduced the grey-belt concept and paragraph 148 makes the classification material to the order in which Green Belt land should be considered for release. Current national guidance expects a Green Belt assessment to evaluate the contribution of sufficiently granular assessment areas to purposes (a), (b) and (d), consider other footnote-7 constraints, identify grey-belt land and assess whether release would fundamentally undermine the five Green Belt purposes of the remaining Green Belt. The Group has not identified a sufficiently granular BL1 assessment showing how the allocation performs against those tests, whether any part of BL1 has been classified as grey belt, how other relevant constraints were treated, or how the paragraph 148 release hierarchy was applied. Without that evidence, the Inspector cannot audit why BL1 was selected ahead of lower-harm or higher-priority release options.

There is no clear, auditable reconciliation between the Brownfield Register, the SHELAA, the Sustainability Appraisal reasonable alternatives and the final allocation schedule showing how lower-harm options were tested and why they were rejected or reduced before BL1 was selected at this scale. The SHELAA's gross theoretical capacity is not the same as deliverable supply, but the reverse is equally important: potentially suitable brownfield and underused sites cannot simply fall out of the strategy, or be assigned materially reduced capacity, without a transparent and evidenced explanation.

The Publication-stage position has moved on from the earlier July 2025 Residential Mix Assessment. The August 2026 Infrastructure Delivery Plan records a minimum Local Plan requirement of 19,040 homes, or 952 per year, while the Council's trajectory projects delivery of 21,170 homes by 2040 —

2,130 above that minimum requirement. A planned buffer or contingency can be legitimate; the Group does not simply subtract 2,130 from the plan. But where the Council proposes to release 113.19 hectares of Green Belt for up to 3,000 homes at BL1, it must explain transparently how much contingency is necessary, what part of the projected headroom BL1 contributes, and whether the minimum requirement can be met without this allocation. The 2025 Authority Monitoring Report and Five Year Housing Land Supply separately records 3,645 units of remaining capacity on sites with planning approval at 1 April 2025 and a 546-unit windfall allowance within the 2025–2030 supply. These figures are not simply additive and must not be double counted; they reinforce the need for one auditable plan-period reconciliation.

The starting housing number also requires a transparent policy trail. National Planning Practice Guidance is clear that the standard method identifies a minimum annual local housing need figure and does not itself produce a housing requirement figure. The Council should therefore show how the applicable local housing need calculation translated into the 19,040-home Local Plan requirement, identify any adjustments or strategic assumptions used in setting that requirement, and then explain why the trajectory rises to 21,170 and what role BL1's 3,000 homes play within that headroom. That does not assume that the difference is automatically unnecessary; it requires the Council to demonstrate that the chosen housing requirement, contingency and Green Belt release are justified as one coherent strategy.

The published Regulation 19 material reviewed by the Group does not provide a transparent end-to-end reconciliation showing how the total plan requirement has been matched against completions, extant and deliverable permissions and commitments, realistic windfall, brownfield and other urban supply, and existing allocations before determining the residual amount that genuinely requires new allocation of Green Belt land. Without that reconciliation, including safeguards against omission and double counting, the Council cannot establish how much additional land needs to be allocated or demonstrate that BL1 is necessary.

Falcon Works exposes the problem. The Council's Brownfield Register records a minimum net capacity of 43 dwellings while noting that the permission has expired; the Local Plan allocation H8 has been reported at eight dwellings; an 87-unit listed-building scheme and a later eight-dwelling application were refused; and the Council has identified urgent works. The Group does not rely on any of those historic figures as proof of present deliverability. It relies on the inconsistency itself. Before 113.19 hectares of Green Belt is released, the Council must explain, site by site, why brownfield capacity has been reduced, constrained or discounted and whether alternative design or remediation could yield more. That explanation has not been provided.

5. Landscape, openness and settlement separation

Policy / soundness conclusion: BL1 is not justified or consistent with NPPF paragraphs 187–188. The Council's own assessment places BL1 in the highest landscape-sensitivity tier used in the study, Medium-High. That rating is not unique to BL1, but it places the site among the most sensitive locations assessed and has not been reconciled with the decision to allocate this boundary for development, despite national policy requiring protection of valued landscapes, recognition of countryside character and preference for land of lower environmental or amenity value.

The Council's 2026 Landscape Sensitivity Assessment describes BL1 as a large area of pastoral and arable land on rising and falling ground, with open fields, mature hedgerows, trees, woodland and views from surrounding roads and rights of way. It performs a transition between the urban edge and wider countryside and is assessed overall as Medium-High sensitivity. Most significantly, the assessment expressly states that development extending prominently into the western or more elevated parts may be difficult to accommodate without adverse effects on openness, rural character and settlement

separation. That is a substantive constraint identified by the Council's own consultant, not a generic landscape observation.

Those findings sit uneasily with a fixed 3,000-home figure. The allocation contains no final parameter plan demonstrating how much land must remain undeveloped, what meaningful gaps will remain between Lightwood, Meir Heath, Rough Close and Cocknage, how ridgelines and views will be protected, or how much land is required for buffers and green infrastructure. Until those constraints are mapped and deducted from developable land, the Council cannot demonstrate that either the boundary or the 3,000-home capacity is justified.

6. Capacity, masterplanning and viability

Policy / soundness conclusion: BL1 is not justified or demonstrably deliverable and is therefore unsound. NPPF paragraph 35 and national viability guidance require cumulative infrastructure, affordable-housing and other policy costs to be realistic at plan-making stage; BL1 has been allocated while substantial costs remain unresolved and the Council's own viability evidence shows limited headroom.

The March 2026 viability evidence modelled BL1 as a broad location. The 3,000-dwelling figure was derived from an assumption of 75 hectares of net developable land at 40 dwellings per hectare within a 113.19-hectare site, with 36 hectares of public open space. That is high-level modelling, not a final masterplan tested against the full land take required for highways, schools, drainage, utilities, open space, ecological buffers, biodiversity net gain, archaeology, mineral safeguarding and other constraints.

The same evidence records limited sensitivity headroom: the baseline residual land value was £268,945 per gross hectare against a benchmark of £250,000; a 5% fall in values or 5% rise in costs produced results below benchmark. The point is not that this proves BL1 unviable. It is that the published appraisal has very little room for costs to move before the result falls below benchmark, while substantial infrastructure, mitigation and abnormal costs remain unresolved. A generic appraisal cannot establish deliverability under those conditions.

Because BL1 is major housing proposed on land to be released from the Green Belt through plan preparation, the NPPF paragraph 156 'Golden Rules' are directly engaged. They require affordable housing, necessary improvements to local or national infrastructure, and new or improved accessible green spaces. Before relevant development-plan policies are updated, paragraph 157 requires the affordable-housing contribution to be 15 percentage points above the highest existing applicable requirement, capped at 50%. The Group does not assume the final affordable-housing percentage for BL1; the material point is that these national policy requirements must be reflected consistently in the same viability, infrastructure, land-budget and phasing assumptions used to justify the allocation.

Statutory biodiversity net gain also has direct land and cost consequences. Subject to the statutory exceptions, development must achieve at least a 10% increase in biodiversity value using the statutory biodiversity metric, and significant on-site habitat enhancements and off-site gains must be secured and maintained for at least 30 years. National guidance says biodiversity net gain should be considered throughout the planning process, not treated solely as a post-permission matter. The Council need not produce a final Biodiversity Gain Plan at allocation stage, but a 3,000-home capacity and viability case cannot ignore realistic land requirements, off-site units or credits where necessary, and long-term management obligations. The published land budget should therefore show how biodiversity-net-gain requirements interact with ecological buffers, SuDS, open space and the assumed 75 net residential hectares, and whether any land is being counted for more than one function.

Soundness consequence: until a boundary-specific parameter plan and a BL1-specific viability appraisal use the same final assumptions for site area, capacity, the Green Belt Golden Rules, affordable housing, biodiversity-net-gain land and delivery costs, infrastructure, mitigation, abnormal costs, phasing and delivery, the Council has not demonstrated that 3,000 dwellings can be delivered on this site.

6.1 Density, topography and blue-green infrastructure

Policy / soundness conclusion: BL1 is not justified or effective because its 3,000-dwelling capacity relies on an assumed 40 dwellings per hectare across 75 hectares of net developable land without demonstrating that this density is achievable once the site's actual physical and environmental constraints are mapped and deducted.

The Council's May 2024 viability assessment records technical consultation in which a consultant suggested 30 dwellings per hectare was more appropriate on large greenfield sites and a housebuilder stated that 40 dwellings per hectare on greenfield sites at the edge of the urban area would be "pushing the limit", with suburbs and urban fringe suggested at 30–35 dwellings per hectare. The same assessment notes that larger greenfield sites tend to have lower net developable areas and assumes SuDS on larger greenfield sites will be incorporated into green spaces. Those observations are directly relevant to BL1; they do not prove a particular alternative density, but they undermine reliance on 40 dph as an untested starting assumption.

BL1 is not a flat, unconstrained greenfield site. The Council's own landscape evidence describes pronounced rising and falling ground and elevated western areas, while the Copshurst stream corridor creates a lower drainage and ecological axis through the site. Those changes in level are functional development constraints, not merely landscape description: they affect cut and fill, highway and active-travel gradients, drainage and SuDS design, visibility, accessibility and the density that can realistically be achieved. The site also contains or connects to multiple watercourses, ditches, mature hedgerows, trees and woodland and must accommodate ecological and biodiversity-net-gain land, green and blue infrastructure, landscape and settlement-separation buffers, roads, schools and other infrastructure, together with minerals, archaeology and other constraints.

Those constraints must be spatially reconciled. The supporting Streetmap extract submitted with this representation illustrates mapped contours and watercourses across and adjoining BL1. It is provided as contextual mapping only and is not relied upon as a hydraulic flood-risk assessment; its value is in showing why topography and the blue network need to be considered together when testing the developable land assumption. The Council should publish a single BL1 physical-constraints plan showing the allocation boundary, contours and slope, watercourses and drainage features, flood and surface-water constraints, SuDS/blue-green infrastructure, woodland and hedgerows, ecological buffers, required open space and other non-developable land. Until that exercise identifies where 75 net residential hectares actually exist, the 3,000-dwelling capacity cannot be relied upon and BL1 is unsound on this point.

National design-code guidance reinforces the need for that spatial exercise. For larger allocated sites, it recognises that a masterplan may be necessary to establish the street network, area types and other key parameters. For BL1, a parameter plan is therefore not a cosmetic later-stage exercise: it is the means by which the Council can demonstrate that housing numbers, access, green and blue infrastructure, open space, schools and other land-hungry constraints can coexist within one deliverable layout. Without that level of spatial reconciliation, the assumed 75 net residential hectares remain an input rather than a demonstrated outcome.

7. Infrastructure and social sustainability

Policy / soundness conclusion: BL1 is not effective and is therefore unsound. NPPF paragraphs 20 and 35 require sufficient provision for strategic infrastructure and a realistic delivery basis; BL1 has no complete costed, funded and phased package for health, education and other essential social infrastructure.

7.1 Education

The August 2026 Infrastructure Delivery Plan attributes 90 pupils per year group to BL1, producing headline requirements of 630 primary and 450 secondary places from 3,000 homes. Across all

proposed site allocations, the same document estimates 3,139 primary and 2,242 secondary places, meaning BL1 alone accounts for around one fifth of the allocation-related requirement. Yet the identified response for Lightwood is only the “exploration” of a new primary school in the south of the city, with further analysis still under way and additional provision to be determined through the planning-application process. The published evidence does not identify a BL1 school site within the land budget, the land required, an academy or provider commitment, capital cost, secured funding, delivery programme or an occupation trigger tied to opening.

Current Department for Education records reinforce the need for that work rather than replacing it. Ormiston Meridian Academy is recorded with 1,015 pupils against a stated capacity of 966. Meir Heath Academy has headline spare capacity, but it is a Staffordshire school and therefore outside Stoke-on-Trent’s own school-place planning. Current rolls are snapshots rather than forecasts and do not establish future catchment capacity, but they show why Stoke cannot assume that neighbouring schools will absorb BL1. Any reliance on Staffordshire provision requires explicit cross-boundary planning, provider agreement and phasing.

Identifying the scale of the education requirement is not the same as demonstrating how it will be solved. Before BL1 can be found effective, the Council must identify the education land requirement, provider, funding, delivery route and occupation trigger for each phase and demonstrate that the assumptions are agreed across both authority areas where relevant.

7.2 Health

The Council's September 2025 Infrastructure Capacity Study already identifies pressure within the Meir Primary Care Network before BL1-specific housing demand is added. It records approximately 37,990 registered patients in January 2024, anticipates 3.73% patient-list growth by 2035 outside housing growth, and identifies a projected requirement for 29 clinical rooms by 2035 when existing provision, population growth and additional roles are considered. The study also records that Primary Care Networks across Stoke-on-Trent are under stress in terms of clinical capacity.

Against that baseline, the Regulation 19 evidence does not provide a BL1-specific health-capacity assessment identifying the additional primary-care requirement generated by up to 3,000 homes, where new or expanded provision would be located, the land required, provider commitment, capital and revenue funding, phasing or occupation triggers. A strategic statement that growth can be accommodated subject to future provision is not a delivery plan.

7.3 Other social and community infrastructure

The same delivery test applies to community facilities, emergency services, open space and recreation, utilities and digital infrastructure. Policy S3 cannot be satisfied by listing needs while leaving location, land, provider, cost, funding and timing unresolved. For each essential item the Council should identify the delivery route, committed and expected funding, phase trigger and contingency, and should prevent occupation beyond the relevant phase until the infrastructure required for that phase is operational.

Open space and recreation require the same discipline. National Planning Practice Guidance advises local planning authorities to consult Sport England on residential development of 300 dwellings or more where no separate statutory consultation requirement applies. That advice is directed principally to development proposals rather than creating a standalone Local Plan legal test, but BL1 at up to 3,000 homes is ten times that threshold and plainly warrants a robust sport and recreation evidence base. The Group has not identified a BL1-specific assessment showing how the assumed 36 hectares of public open space relates to generated demand, playing pitches and school provision, the Green Belt Golden Rules for accessible green space, SuDS, biodiversity net gain and ecological mitigation, or

whether land is being double counted across those functions. The Council should publish that reconciliation and identify any Sport England input relevant to BL1.

8. Transport, access, active travel and air quality

Policy / soundness conclusion: BL1 is inconsistent with national transport policy and is therefore unsound. NPPF paragraphs 109, 110 and 115 require transport impacts to be understood from the earliest stages, significant development to be sustainably located, and safe and suitable access and mitigation to be established. Paragraphs 129-130 also require density to reflect infrastructure and service capacity, sustainable travel and accessibility. BL1 has been allocated at an assumed 40 dwellings per hectare without either a site-specific transport model, a tested access solution or a secured public-transport offer capable of supporting that scale and density.

BL1's effects cannot be assessed only at its site entrances. The surrounding network includes narrow country lanes and routes through Lightwood, Meir Heath, Meir Park, Rough Close, Cocknage and Longton, with onward effects toward the A50 and A500. The Council's September 2025 Infrastructure Capacity Study records significant peak-period over-capacity on the A50, A500 and key local roads, and states that existing congestion increases journey times and contributes negatively to poor air quality. It also records poor internal connectivity away from the strategic road network.

Safe and suitable access for all users has to be demonstrated at allocation stage; it cannot be assumed because access may be technically possible somewhere on the boundary. The published evidence does not yet identify a tested access solution showing junction geometry, visibility, gradients, traffic flows, cumulative growth, HGV tracking, emergency access, bus operation, highway drainage and effects on hedgerows, verges, properties, pedestrians, cyclists and equestrians. Nor does it demonstrate the construction-traffic and mitigation implications across the whole affected network, including Staffordshire routes.

The decisive issue is not a headline estimate of daily vehicle movements. It is the absence of a transparent BL1-specific model from which trip generation, distribution, junction performance, active-travel mode share, air-quality effects and mitigation can be tested. Without that model, the transport consequences of the allocation remain unproven.

8.1 Public transport, accessibility and car dependence

The Council's own Regulation 19 Sustainability Appraisal identifies the nearest railway stations as Longton, approximately 2.4 km to the northwest, and Blythe Bridge, approximately 3 km to the east. For BL1 itself it identifies bus stops only at the eastern edge on Lightwood Road, served by PC5 and service 50. That is a description of nearby provision; it is not evidence that a 3,000-home development can be served by a frequent, comprehensive and deliverable public-transport network.

The distinction is material. PC5 is a college-day service rather than an all-day general bus service. Current Traveline National Dataset timetable information for service 50, checked on 8 September 2026, shows four Monday-to-Friday daytime journeys reaching Lightwood, with no evening or weekend journeys shown. The Council's own bus-funding material describes service 50 as a supported service for communities identified as not having close access to the local bus network and records it as operating hourly in the middle of the day, Mondays to Fridays. Neither the Sustainability Appraisal nor the Infrastructure Delivery Plan demonstrates a secured, frequent, all-day and seven-day public-transport service capable of serving BL1 throughout its build-out.

This deficiency also bears directly on the assumed density. NPPF paragraph 129 requires appropriate density to take account of the availability and capacity of infrastructure and services and the scope to promote sustainable travel modes that limit future car use. Paragraph 130 directs significant density uplift towards city and town centres and other locations well served by public transport, and recognises that density ranges may reflect the accessibility and potential of different areas. National policy does not prescribe a station-distance threshold for 40 dwellings per hectare, but it does require the Council to demonstrate why the density assumed for BL1 is appropriate to the site's actual and deliverable accessibility.

The Council's own Policy T3 points the same way: new development is intended to support a modal shift away from the private car by being located and designed to connect with public-transport infrastructure, with safe and direct walking and cycling routes to public-transport interchanges. No allocation-wide public-transport plan has been published for BL1 identifying routes, stop locations, realistic walking catchments and gradients, frequencies, operating hours, capacity, operator commitments, funding, phasing or delivery triggers. For a site of this scale and topography, edge-of-site stops do not fill that evidential gap. Without a secured and deliverable public-transport offer, BL1 risks being car-dependent by design.

Topography is not a minor design detail. A bus stop or facility shown on a plan does not establish sustainable accessibility where substantial parts of the site face steep or indirect walking and cycling routes. Until realistic gradients, walking catchments and safe routes to schools, services and public transport are demonstrated for every phase, the Council has not shown that the development can achieve the sustainable travel assumptions on which its strategy depends.

9. Water supply, wastewater, drainage and flood risk

Policy / soundness conclusion: BL1 does not accord with NPPF paragraphs 170–172 or national water and wastewater guidance and is therefore unsound on this point. The allocation proceeds without BL1-specific evidence resolving flood risk from all sources and cumulative effects, or demonstrating that the necessary water and wastewater infrastructure can be aligned and phased with development.

The water evidence is more qualified than a simple statement that treatment capacity is unavailable. The August 2026 Infrastructure Delivery Plan records that Strongford and Checkley wastewater-treatment works are forecast to remain within permit capacity for planned growth. However, the same document records that 37 storm overflows exceeded investigation thresholds during 2023–2025 and states that the Strongford storm overflow is “performing poorly and requires investigation and improvement before significant additional growth is accommodated”. The Council’s Water Cycle Study, prepared with Severn Trent Water and the Environment Agency, likewise identifies limited network capacity and the potential for increased storm-overflow operation, and requires early and continuing engagement with Severn Trent so necessary water and wastewater upgrades can be planned and in place before occupation. That strategic position does not demonstrate that BL1 itself can be served without local network reinforcement. No BL1-specific evidence has been published showing potable-water capacity, foul-sewer network capacity, required reinforcement, costs, phasing, storm-overflow implications and provider commitments. For an allocation of this scale, that remains a material delivery gap.

The strategic flood assessments do not substitute for a site-specific, all-sources assessment. BL1 requires a catchment-wide surface-water strategy covering the Copshurst corridor, ordinary watercourses, ditches and culverts; pre- and post-development runoff rates and volumes; climate-change allowances; exceedance routes; safe access and egress; long-term SuDS maintenance; and cumulative and cross-boundary effects.

At Cocknage Road beside the pond (approximately SJ 9200 4063), resident evidence reports recurrent highway flooding. A photograph taken at approximately 3pm on 28 August 2026 records standing water/flooding at the location. Staffordshire County Council's 10 September 2026 EIR response and accompanying Highway Operations Site History Report independently record a culverted water course at this section of Cocknage Road together with repeated flooded or blocked-gully and drainage-maintenance records. The County records include occasions when a blocked gully was recorded as not draining surface water away and damaging the road. These records establish an existing documented drainage feature and recurring highway-water issue; they do not establish the hydraulic cause of the 28 August 2026 flooding or demonstrate that BL1 would worsen it. The road, pond, flow route, culverted watercourse, drainage assets, incident history and potential BL1 runoff effects therefore require site-specific assessment before the allocation boundary and capacity are fixed.

Residents also report recurrent flooding on Woodpark Lane in the vicinity of the historic brook crossing on the former Bog Lane. The Group does not treat those reports as proof of frequency or hydraulic cause. On 7 August 2026 it requested from Stoke-on-Trent City Council the records for the Woodpark Lane watercourse crossing, bridge/culvert and reported flooding under reference SOT-148507. The Council acknowledged the request and stated that a response was due by 7 September 2026; no substantive response had been identified by the Group as at 13 September 2026. The historic crossing, resident reports and outstanding records together reinforce the need to establish the existing drainage assets, flood history and flow routes before BL1's boundary and capacity are fixed.

10. Ecology and green infrastructure

Policy / soundness conclusion: BL1 has not been shown to be consistent with NPPF paragraph 192 and is therefore unsound on the evidence published. Paragraph 192 requires plans to identify, map and safeguard components of local wildlife-rich habitats and the wider ecological network. The Council has fixed BL1's developable area and capacity without the site-specific surveys and mapping needed to establish how that requirement applies across this allocation.

The Council's landscape evidence identifies a connected network of grassland, mature hedgerows, hedgerow trees, woodland, riparian habitat, open mosaic habitat around former quarry land and the Copshurst Stream Valley Woodland Local Wildlife Site connection. These features affect the developable area, layout, access, biodiversity net gain and viability.

Biodiversity net gain does not remove the need for that site-specific ecological evidence. The statutory framework generally requires at least 10% biodiversity net gain measured using the statutory metric, with significant on-site enhancements and off-site gains secured for at least 30 years. For BL1, those requirements create spatial, management and viability implications that should be understood before a 75-hectare net residential area is relied upon. The allocation evidence should therefore show the realistic land and delivery allowance for biodiversity net gain, including how it interacts with habitat retention, buffers, green infrastructure, SuDS and open space, without assuming that the same hectare can satisfy every requirement simultaneously.

The plan-level Habitats Regulations Assessment concerns internationally designated sites and does not provide the detailed BL1 appraisal needed to understand the local ecological network. It therefore cannot fill the site-specific evidence gap. Seasonal surveys and local ecological records are required to establish what habitats and species constraints exist, how much land they remove from development and what mitigation is feasible before a 3,000-home capacity is relied upon.

Resident reports of badgers and other species are being treated carefully. Sensitive locations are not reproduced publicly, and unverified sightings are not presented as fact. The policy should nevertheless require appropriate seasonal surveys, a local records search, confidential handling of protected-species data, mapped buffers and a secured green-infrastructure and biodiversity strategy before capacity is relied upon.

11. Minerals and ground conditions

Policy / soundness conclusion: BL1 is inconsistent with NPPF paragraphs 222, 223 and 225 and with the Council's own adopted mineral-safeguarding policy. Minerals are finite and can only be worked where they occur; BL1 fixes the site boundary and a 3,000-dwelling capacity before establishing the extent and significance of the safeguarded mineral resource, the risk of sterilisation, or whether prior extraction is practical and environmentally feasible.

The Sustainability Appraisal records Mineral Safeguarding Area A3 over part of BL1. This is not merely a resident concern or an incidental mapping designation. The adopted Stoke-on-Trent and Newcastle-under-Lyme Core Spatial Strategy, Policy CSP8, specifically identifies scarce Etruria Marl resources within Stoke's mineral safeguarding areas and requires all reasonable steps to be taken to avoid sterilisation. Its supporting text describes Etruria Marls in Stoke-on-Trent as nationally scarce and says that, where built development threatens sterilisation, the existence and viability of reserves should be established and opportunities for prior recovery considered.

There is also site-specific historical context. Earlier joint minerals-plan evidence records Etruria Marl extraction at Lightwood, including selective working and processing for ceramic products. That historic record does not prove that the remaining safeguarded resource beneath BL1 is commercially viable today, but it demonstrates that mineral safeguarding in this location is not theoretical. The Council therefore needs current evidence establishing the precise safeguarded extent, mineral type, quantity, quality, economic significance and recoverability before housing development is allowed to sterilise it.

National policy points in the same direction. NPPF paragraph 222 recognises minerals as a finite natural resource that can only be worked where they are found; paragraph 223 requires mineral resources to be safeguarded and encourages prior extraction where practical and environmentally feasible; and paragraph 225 says non-mineral development should not normally be permitted in Mineral Safeguarding Areas where it could constrain potential future mineral working. The Regulation 19 evidence reviewed by the Group does not show how those tests have been applied to BL1.

A BL1-specific mineral-resource assessment is therefore required to establish what resource is present, whether viable reserves would be sterilised, whether prior extraction is practicable, and what extraction, remediation or safeguarding would do to phasing, landscape, access, abnormal costs and viability. That work must also be reconciled with the same land budget used to support 75 hectares of assumed net developable residential land and 3,000 dwellings. Reported faulting and mining legacy separately require a desk study and proportionate site investigation. Until those matters are resolved together, the Council has not established either the genuinely developable area or the deliverability of the capacity it has allocated.

12. Archaeology, heritage and historic landscape

Policy / soundness conclusion: BL1 is not consistent with NPPF paragraphs 203 and 205 and is therefore unsound on the evidence published. The Council's own BL1 archaeological mapping identifies mapped 'Archaeological Sites' across substantial parts of the allocation, while the Historic Environment Record identifies two uninvestigated areas and the Council's own archaeologist has advised further assessment. Yet no allocation-wide evaluation has established the significance, extent or development implications of those constraints before the boundary and 3,000-home capacity were fixed.

The Council's BL1 Archaeological Sites map, produced on 21 July 2026, does not depict archaeology as two isolated points. Its 'Archaeological Sites' layer extends across a broad contiguous area in the northern part of BL1 and identifies further mapped areas towards the eastern side of the allocation. The map distinguishes 'Archaeological Sites' from 'Ancient Monuments'; the Group does not suggest that every shaded area is a scheduled monument or of equal archaeological significance. The material point

is that the Council's own spatial evidence identifies archaeology as a constraint across a substantial part of BL1, yet the published capacity evidence does not show how those mapped areas have been treated in deriving 75 hectares of assumed net developable residential land.

Within that wider mapped context, the Historic Environment Record identifies two uninvestigated areas of potential archaeological interest within BL1: land at Lightwood Road/Woodpark Lane (HER 30990) and land at Copshurst (HER 30991). The Council's Senior Planning Officer for Archaeology/HER/Heritage has confirmed that archaeological assessment has consistently been advised. His position must be represented accurately: potential is considered low, but the limited earlier work was too small and focused on previously developed sites to discount further investigation across this large, largely unaltered agrarian area; trial trenching is the likely initial evaluation.

The allocation also lies within a historic rural landscape of lanes, hedgerows and farmsteads, with designated heritage assets in the wider setting. Historic photographs record a bridge and brook crossing on the former Bog Lane, now Woodpark Lane. They do not prove that the present structure is original, but they establish a historic crossing whose surviving form, significance, condition and interaction with highway, drainage and service works should be assessed.

Soundness consequence: the 3,000-home capacity cannot be relied upon until allocation-wide archaeological evaluation and an appropriate heritage and historic-landscape assessment establish the significance and extent of the Council-mapped archaeological areas, what must be avoided, investigated or mitigated, and how those requirements affect the same developable land budget used to support 75 hectares at 40 dwellings per hectare.

13. Climate resilience, natural capital and agricultural land

National policy / soundness conclusion: BL1 has not been shown to accord with NPPF paragraphs 187–188, Natural England guidance or current national land-use policy. The Council is proposing permanent conversion of actively used pastoral, hay-production and arable land without establishing the extent of best and most versatile agricultural land, the agricultural production capacity that would be lost, or how that permanent loss has been weighed against soils as natural capital, food-production resilience and the preference for poorer-quality agricultural land where significant development of agricultural land is necessary.

BL1 is not simply 'greenfield' land awaiting a future use. The Council's own landscape evidence records pastoral grazing, fields managed for hay production and arable farming within the allocation. Those uses demonstrate that substantial parts of BL1 are already performing an agricultural and food-production function. Permanent urban development would remove that productive capacity as well as permanently changing the landscape character of the land.

England's first Land Use Framework, published by Defra in March 2026, places that loss in a wider strategic context. It seeks to balance housing, nature, climate resilience and food production; states that best and most versatile farmland should be safeguarded from permanent land-use change such as urban expansion; and says permanent changes in agricultural land use should be reflected in future Food Security Reports so that the food-security implications of strategic development decisions can be better understood. The Framework does not create a standalone prohibition on development of BL1, but it reinforces the need to understand and justify the permanent loss of productive agricultural land rather than treating that loss as incidental. The Council has not quantified the area of BL1 currently in productive agricultural use or assessed the agricultural production capacity that would be permanently removed.

Defra's predictive mapping indicates that Grade 2 and Subgrade 3a land may be present, alongside lower grades. Grade 2 and Subgrade 3a form part of the best and most versatile agricultural-land category, but the predictive dataset is not suitable for establishing field-scale grades. Natural England

explains that Agricultural Land Classification reflects matters including the range of crops that can be grown, yield, consistency of yield and production requirements, and advises that detailed survey may be necessary where adequate site data do not exist. The extent and quality of BL1's best and most versatile land therefore remain unknown. That uncertainty is not a reason to disregard the issue; it is a reason to resolve it before the boundary and capacity are treated as fixed.

The agricultural-land question also overlaps with climate resilience and natural capital. BL1's soils, grassland, stream corridor, hedgerows and woodland provide permeable land, runoff attenuation, cooling, carbon storage and ecological connectivity, while the Council's own Climate Change and Environmental Resources objective includes maintaining soil, geological and land resources. Those functions have not been quantified or reconciled with the 75-hectare net-developable-land assumption. A detailed Agricultural Land Classification survey and Soil Resource Plan should therefore identify current agricultural use, map any best and most versatile land, assess the productive and natural-capital functions that would be permanently lost, demonstrate how unnecessary loss has been avoided or minimised, and show how retained and stripped soils would be protected and reused. Until that work is reflected in the developable land budget, the Council has not demonstrated that the environmental and agricultural consequences of BL1 are justified.

14. Cross-boundary and cumulative effects

Soundness / effectiveness conclusion: the statutory Duty to Cooperate has been abolished for legacy-system plans progressing under the existing plan-making system, so the Group does not rely on section 33A as a separate legal test. Cross-boundary joint working nevertheless remains material to whether BL1 is justified, effective and deliverable. The published evidence does not demonstrate that Staffordshire transport, drainage, infrastructure and community effects have been fully assessed and addressed through effective joint working.

BL1 sits at the city edge, but its consequences do not. Traffic, drainage, landscape, ecology and service effects extend into Staffordshire and must be assessed as part of the allocation itself. The published evidence must demonstrate effective joint working with Stafford Borough Council, Staffordshire County Council, the relevant highway and flood authorities, infrastructure providers and affected communities. Where the success of the allocation depends on matters outside Stoke-on-Trent's boundary, the adequacy and outcome of that joint working are central to whether BL1 is justified and effective.

Community engagement has also been spatially uneven. The Council's published Regulation 19 programme comprised 15 in-person drop-in sessions promoted as taking place across the city. The Group has not identified an equivalent consultation event within the directly affected Staffordshire communities immediately adjoining BL1, despite the transport, drainage, landscape, ecological and service effects identified in this representation extending beyond Stoke-on-Trent's administrative boundary.

The Group recognises that any person could make a Regulation 19 representation and does not suggest that every resident outside the city boundary was legally entitled to individual notification. The issue is one of effective engagement. Formal availability of an online consultation is not the same as ensuring that communities immediately outside the plan-making authority's boundary, but potentially experiencing material effects from its largest strategic housing allocation, had equivalent awareness and practical opportunity to engage. The Council should demonstrate what targeted steps were taken to identify and inform residents and community organisations in the adjoining Staffordshire impact area, how Stafford Borough Council and Staffordshire County Council assisted in that engagement, and how the views of those communities informed the assessment of BL1.

The same applies to cumulative effects. BL1 must be assessed alongside committed and proposed development and relevant allocations across both authority areas. Deferring cross-boundary modelling, mitigation or provider agreement to a later planning application would mean approving the strategic allocation without first establishing whether the wider network and infrastructure can absorb it.

15. Required modification

The Group asks the Council to make the following main modification:

Main modification: Delete Allocation BL1 from the Local Plan and amend the Policies Map so that the land remains within the Green Belt.

Deletion remains the Group's required modification. The requirements below are not offered as an alternative preference, a compromise or a concession that a reduced or modified BL1 would be acceptable. They identify the minimum work that would still be required if the Council refuses the Group's requested deletion. A refusal to delete BL1 does not make the current allocation sound: at an absolute minimum, the policy would have to be rewritten so that the boundary and capacity derive from the following completed and examined work, rather than the work being deferred until after the strategic decision has been made:

- A final constraint-tested parameter plan and capacity assessment, supported by an appropriate masterplan/design framework, showing contours and slope, watercourses, drainage and SuDS, green and blue infrastructure, biodiversity-net-gain land, ecological and landscape buffers, open space, schools and other protected or non-residential land, and the net developable area used to support any density and capacity assumption.
- A BL1-specific viability appraisal using the final Green Belt Golden Rules, affordable-housing, infrastructure, biodiversity-net-gain delivery and long-term management, mitigation and abnormal-cost assumptions.
- A costed and funded infrastructure schedule, including infrastructure and accessible-green-space requirements arising from the Green Belt Golden Rules and evidenced sport/recreation needs, with provider commitments, sites, phasing, delivery triggers and contingency.
- Whole-network transport, access, construction-traffic, active-travel and air-quality assessments, including cumulative and cross-boundary effects.
- BL1-specific water-supply, wastewater, drainage, flood-risk and safe-access evidence, including Cocknage and Copshurst catchments.
- Seasonal ecological surveys, protected-species safeguards and a secured green-infrastructure and biodiversity strategy, including statutory biodiversity-net-gain metric evidence, realistic on-site/off-site delivery assumptions and long-term management where required.
- A BL1-specific mineral-resource and ground-condition assessment addressing Etruria Marl safeguarding, sterilisation, prior extraction, faulting and mining legacy, reconciled with the final developable land budget; together with archaeological and heritage assessment, climate-resilience and natural-capital assessment, and a detailed Agricultural Land Classification and Soil Resource Plan addressing current agricultural use, productive capacity, best and most versatile land and permanent agricultural-land loss.
- An auditable housing-need, housing-supply, Green Belt and reasonable-alternatives reconciliation showing the route from the applicable local housing need calculation to the 19,040-home requirement and 21,170-home trajectory; how that requirement has been matched against completions, extant and deliverable permissions and commitments, realistic windfall, brownfield and other urban supply and existing allocations; and a sufficiently granular Green Belt assessment identifying any grey-belt land and demonstrating how the paragraph 148 release hierarchy was applied before concluding that BL1 is necessary.

16. Examination hearing request

The Lightwood Community Group wishes to participate in relevant examination hearing sessions. Oral participation is necessary because BL1 is the plan's largest strategic housing allocation, involves Green Belt release and raises interdependent technical and cross-boundary questions that cannot be reduced to a single topic. The Group can assist the Inspector with local evidence, identify where claims are firsthand rather than technical, and respond to the Council and infrastructure bodies on the adequacy and deliverability of proposed modifications.

David Evans, Chair, and Lorraine Zutshi, local resident, are the proposed participants, with an authorised substitute if required. The Group asks to be kept informed of all examination stages and correspondence relating to BL1.

17. Evidential discipline

This representation distinguishes established evidence, resident observation, inference and matters requiring verification. Where evidence is incomplete, the Group says so. That discipline does not weaken the objection; it strengthens it. The central case does not depend on proving that BL1 could never accommodate any development. It is that the Council has chosen this Green Belt boundary and a capacity of up to 3,000 dwellings without first producing the final, site-specific and auditable evidence necessary to justify that decision and demonstrate its delivery. On the evidence published, that case has not been made.

Schedule 1. Principal evidence

- [1] **Stoke-on-Trent City Council, Publication Local Plan and proposed Policies Map, Regulation 19, 2026 - Allocation BL1, associated policy requirements and the proposed Green Belt boundary change.**
- [2] **Stoke-on-Trent City Council, Regulation 19 Integrated Sustainability Assessment, June 2026 - BL1 site appraisal and transport accessibility, pp. 262-263; Policies T1-T4 appraisal, pp. 58 and 239-242.**
- [3] Lepus Consulting for Stoke-on-Trent City Council, Landscape Sensitivity Assessment, final June 2026 - BL1 Lightwood assessment, pp. 47-49 (PDF pp. 56-58).
- [4] Stoke-on-Trent City Council, Local Plan Viability Assessment Update Note, March 2026 - section 7, Table 7.1 and strategic-site sensitivity testing.
- [5] Stoke-on-Trent City Council, Infrastructure Capacity Study Baseline Report, September 2025 - transport, wastewater and infrastructure baseline.
- [6] Stoke-on-Trent City Council, Infrastructure Delivery Plan, August 2026 - infrastructure needs, provider context and Appendix 3 school requirements.
- [7] Stoke-on-Trent City Council, Level 2 Strategic Flood Risk Assessment, December 2021 - site-specific assessment, climate change, drainage and safe access guidance.
- [8] Stoke-on-Trent City Council, Local Plan Habitats Regulations Assessment, July 2026 - plan-level/international-site assessment.
- [9] Stoke-on-Trent City Council, SHELAA 2026 Summary and appendices - site assessment scope, assumptions and limitations.
- [10] Stoke-on-Trent Brownfield Register and Local Plan allocation schedule - including Former Falcon Works / H8 capacity records.
- [11] Stoke-on-Trent Historic Environment Record - HER 30990 and HER 30991; email clarification from Jonathan Goodwin, Senior Planning Officer (Archaeology/HER/Heritage), 10 August 2026.
- [12] Stoke-on-Trent City Archives / Staffordshire Past Track - "Bog Lane bridge and brook, Lightwood" and "Bog Lane bridge", c.1895-1905.
- [13] Staffordshire County Council Planning Committee report S.06/25/401 M, 12 July 2007 - separate mine-gas proposal and ditchcourse/culvert context; not treated as the Cocknage pond crossing.
- [14] Defra, Predictive Agricultural Land Classification Map for England, 2026; Natural England, Guide to assessing development proposals on agricultural land, updated 24 July 2026.
- [15] National Planning Policy Framework, December 2024 - plan period, soundness, effective use of land, Green Belt, transport, infrastructure, flooding, natural environment, minerals and heritage.
- [16] National Planning Policy Framework, August 2026 - Annex A implementation and transition provisions.
- [17] **Stoke-on-Trent City Council, Local Plan timetable, "Have your say" pages and Regulation 19 consultation publicity, accessed 8 September 2026 - consultation dates, city-wide event programme and public-engagement arrangements.**
- [18] Stoke-on-Trent City Council Planning Policy procedural clarification forwarded by Councillor Faisal Hussain, 4 September 2026.
- [19] Lorraine Zutshi, dated photograph and firsthand account of conditions at Cocknage Road beside the pond, approximately 3pm, 28 August 2026; location approximately SJ 9200 4063.
- [20] **Lightwood Community Group, BL1 Consolidated Objection Matrix – Submission Version, updated 13 September 2026.**
- [21] **Stoke-on-Trent City Council, Residential Mix Assessment, July 2025 - earlier housing-need and completions baseline. The Publication-stage minimum requirement is now recorded as 19,040 homes (952 per year) in the August 2026 Infrastructure Delivery Plan.**
- [22] **Stoke-on-Trent City Council, Planning Services Authority Monitoring Report and Five Year Housing Land Supply 2025 - planning approvals, deliverability and lapse assumptions, windfall allowance and housing supply.**
- [23] **Stoke-on-Trent City Council / HDH Planning & Development Ltd, Local Plan Viability Assessment, May 2024 - density assumptions and technical consultation, including urban-fringe greenfield density concerns and treatment of SuDS within green space.**

[24] Stoke-on-Trent City Council, Enhanced Partnership Plan and Scheme and Bus Service Operators Grant funding material; First Bus Potteries, service changes effective 30 August 2026; Traveline National Dataset timetable for service 50, checked 8 September 2026 - current Lightwood bus-service operating pattern, support status and PC5 college-day service.

[25] Planning Inspectorate, Procedure Guide for Local Plan Examinations - pre-submission expectations, including resolving substantive soundness and legal-compliance concerns before submission and not assuming that examination can rectify significant problems.

[26] Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council, Core Spatial Strategy 2006-2026, adopted 2009 - Policy CSP8 and supporting text on scarce/nationally scarce Etruria Marl resources, mineral safeguarding and avoidance of sterilisation.

[27] Staffordshire and Stoke-on-Trent Minerals Local Plan 1994-2009 - historic evidence of Etruria Marl extraction at Lightwood and the local mineral-resource context.

[28] Stoke-on-Trent City Council, BL1 Archaeological Sites map, produced 21 July 2026, scale 1:5669 at A3 - Council GIS mapping showing the 'Archaeological Sites' layer across broad areas of BL1 and a separate 'Ancient Monuments' layer.

[29] Department for Environment, Food & Rural Affairs, Land Use Framework for England, published 18 March 2026 - national strategic context for balancing development, food production and environmental outcomes; safeguarding best and most versatile farmland from permanent land-use change; and monitoring agricultural land loss in relation to food security.

[30] Planning Inspectorate, Local Plans: pre-examination checklists (legacy system), updated 18 August 2026 - legacy-system examination requirements updated to reflect abolition of the Duty to Cooperate while retaining soundness and effectiveness requirements for strategic cross-boundary matters.

[31] Stoke-on-Trent City Council, Regulation 19 consultation publicity, 3 August, 10 August and 26 August 2026 - Council publicity describing consultation events as city-wide and confirming a programme of 15 drop-in sessions.

[32] Department for Education, Get Information About Schools, current records checked 8 September 2026 - current stated capacities, pupil rolls and local-authority coverage for relevant nearby schools including Ormiston Meridian Academy and Meir Heath Academy; treated as current snapshots rather than future capacity forecasts.

[33] Stoke-on-Trent City Council / JBA Consulting, Water Cycle Study Phase 2 Final Report, August 2022, prepared with Severn Trent Water and the Environment Agency - wastewater-network capacity, storm-overflow risk and early-engagement requirements to secure upgrades before occupation.

[34] Information-rights correspondence: Stoke-on-Trent City Council request SOT-148507, Woodpark Lane watercourse crossing/bridge/culvert and flood records, received 7 August 2026 and stated due 7 September 2026; Staffordshire County Council request F0038300, Cocknage Road flooding/drainage/culverted watercourse, answered 10 September 2026. These records evidence the request chronology and status; the substantive Staffordshire highway records are identified separately at [45].

[35] Stoke-on-Trent City Council, Local Plan Green Belt / consultation guidance, accessed 8 September 2026 - Council explanation that other options, including suitable brownfield, built-up land and neighbouring-authority options, should be exhausted before Green Belt sites are considered.

- [36] Ministry of Housing, Communities and Local Government, Planning Practice Guidance: Green Belt, updated 2025 - Green Belt assessment methodology, sufficiently granular assessment areas, purposes (a), (b) and (d), footnote-7 constraints, grey-belt identification and effects on the remaining Green Belt.
- [37] Ministry of Housing, Communities and Local Government, Planning Practice Guidance: Biodiversity Net Gain, updated 31 July 2026; Defra, Understanding Biodiversity Net Gain - statutory 10% objective, statutory biodiversity metric and minimum 30-year securing of significant on-site and off-site habitat gains.
- [38] Ministry of Housing, Communities and Local Government, Planning Practice Guidance: Housing and economic needs assessment, updated 24 February 2025 - standard method as a minimum local housing need figure rather than the housing requirement figure.
- [39] Planning Inspectorate / Ministry of Housing, Communities and Local Government, Local plans: the examination process legacy system, 2026 - 31 December 2026 final date for submission under the legacy regulations.
- [40] Ministry of Housing, Communities and Local Government, Planning Practice Guidance: Open space, sports and recreation facilities - advice to consult Sport England on residential development of 300 dwellings or more where no separate statutory consultation requirement applies.
- [41] Ministry of Housing, Communities and Local Government, Creating a design code / National Model Design Code guidance - masterplanning for larger allocated sites and establishment of key spatial parameters.
- [42] Streetmap.co.uk mapping extract, September 2026 - contextual mapping showing contours and mapped watercourses within and adjoining BL1; submitted as illustrative supporting material and not relied upon as a hydraulic flood-risk assessment.
- [43] Stoke-on-Trent City Council, Local Development Framework Proposals Map – Southern Half, updated 2013 - current adopted-policy mapping showing the existing Green Belt boundary in the Lightwood area.
- [44] CPRE, Interactive Map of England's Green Belt, accessed 11 September 2026 - illustrative secondary mapping showing the existing Green Belt context around Lightwood; included for visual context only and not relied upon in place of the Council's adopted-policy mapping.
- [45] Staffordshire County Council, EIR response F0038300 and Cocknage Road Highway Operations Site History Report, 10 September 2026 - highway records for Cocknage Road, including repeated flooded/blocked-gully and drainage-maintenance records and references to a culverted water course near the pond/Rough Close section.

Submission details

Submitted by: David Evans, Chair, Lightwood Community Group

Date: 13 September 2026

Correction note: This corrected version was issued on 14 September 2026 solely to replace references to the earlier Regulation 18 site area of 115.89 hectares with the Regulation 19 allocation area of 113.19 hectares. No substantive ground of objection, requested modification or supporting evidence has been changed.