
From: planningcomments@staffs Moorlands.gov.uk
Sent: 08 July 2025 12:00
To: Planning Comments (SMDC)
Subject: Comment Received from Public Access

Categories:

Application Reference No. : SMD/2025/0250 Site Address: Land off Leek Road Werrington Staffordshire ST9 0DQ
Stoke-On-Trent Comments by: Warwick McKenzie Staffordshire County Councillor for Caverswall

From:

County Buildings
Martin Street
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Submission: Objection

Comments: I write to formally object to the outline planning application reference SMD/2025/0250.

Although currently at EIA screening stage, I assert that the proposed development fails to comply with both statutory planning obligations and adopted local and national planning policy. My reasons are outlined as follows:

1. ENVIRONMENTAL IMPACT ASSESSMENT REQUIRED

> Under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, a screening opinion is mandatory where development "likely to have significant effects on the environment" is proposed, particularly in or near sensitive areas.

> The application fails to provide adequate baseline environmental data (e.g., biodiversity surveys, hydrology, air quality), thereby preventing the Council from making an informed screening decision.

> Without full EIA, the Council risks non-compliance with Regulations and undermines public confidence.

2. CONFLICT WITH LOCAL AND NATIONAL PLANNING POLICY

> Staffordshire Moorlands Local Plan stipulates development must not harm landscape character, heritage assets, or biodiversity. No Landscape Visual Impact Assessment or Heritage Statement accompanies the submission.

> Paragraph 174 of the National Planning Policy Framework (2023) requires planning decisions to protect and enhance the natural environment, particularly delivering measurable net gains for biodiversity. The absence of biodiversity net gain evidence contravenes this obligation.

3. INADEQUATE INFRASTRUCTURE ASSESSMENT

> No Transport Assessment or Traffic Impact Report has been submitted. Leek Road is a rural route with limited capacity, no pavements, and acute safety concerns. This omission fails to satisfy NPPF requirements under paragraph 112 regarding sustainable transport and highway safety.

> Utilities and services - such as foul drainage, water supply, schools, and healthcare - have not been assessed. This undermines the Council's duty under Regulation 122 of the Community Infrastructure Levy (CIL) Regulations, which requires developer contributions to mitigate impacts.

4. FLOOD RISK AND DRAINAGE

> No Flood Risk Assessment (FRA) or drainage strategy has been included. The site is adjacent to minor watercourses and within a catchment area prone to surface water flooding. Without detailed hydraulic analysis, the proposal may exacerbate downstream flood risk, contrary to NPPF Section 14 and Local Plan policy.

5. PRECEDENT AND CUMULATIVE IMPACT

> Granting permission at an outline/EIA screening stage without robust evidence sets a dangerous precedent, potentially encouraging speculative development with minimal information.

> The Council must consider cumulative impacts in EIA screening. Other approved developments near Leek Road are omitted from the applicant's assessment, which fails Regulation 18 of the EIA Regulations.

In summary, this application is premature and non-compliant with national and local legal planning requirements. Key assessments - environmental, transport, drainage, infrastructure - are wholly absent. Until a full EIA, including Biodiversity Net Gain, Traffic, FRA, Utilities Assessment, and Landscape/Heritage Statements, are provided, the Council cannot lawfully proceed. I urge that permission be REFUSED or that a formal EIA SCREENING OPINION is issued requiring a full Environmental Impact Assessment.

Yours sincerely,

Warwick McKenzie

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